

- (a) State the location at which and dates on which it was held;
- (b) Identify any and all persons/entities sponsoring the same;
- (c) Identify the representative(s) attending on behalf of defendant and/or any predecessor/related entity;
- (d) Specify which of the subjects listed in Interrogatory No. 50 was discussed etc.; and,
- (d) Identify any and all documents referring to, relating to, and/or reflecting said meeting, seminar, conference, symposium and/or gathering.

ANSWER: - Gleason objects to this Interrogatory as overly broad, burdensome, harassing, excessive in scope and time and incorrectly implying that its products were a health hazard. By way of further response, see documents provided.

INTERROGATORY NO. 52:

Identify any and all agreements, oral or written, between or among defendant, any of the other defendants in these lawsuits, any organization, association or other entity including, but not limited to, those identified in response to Standing Order No. 1 Interrogatory No. 61 and/or any medical or scientific foundations, relating to:

- (a) Specifications for any asbestos-containing product(s);
- (b) Warning or caution labels to be applied to asbestos products and/or their packaging, cartons, containers, or boxes;
- (c) Methods of dissemination of public relations information to defendant's purchasers, advertisers, distributors, factory workers, contractors, insulators, users, consumers of asbestos products and/or the general public; and/or
- (e) Safety equipment and/or protective clothing to be utilized while handling asbestos products.

ANSWER: - N/A.