

SECTION 4.0

4.01 Does or did defendant provide pulmonary function tests on its asbestos-exposed workers?

ANSWER: Yes.

4.02 If the answer to the foregoing interrogatory is in the affirmative, state:

- (a) The nature of such program(s);
- (b) Whether such program was optional or mandatory; if mandatory, when it became so;
- (c) The location(s) of such program(s);
- (d) The date of service of such program(s);
- (e) If any of the program(s) have undergone modification, the nature and dates of such modification;
- (f) The custodian (by name, address and position) of records of such pulmonary function test program(s);
- (g) The highest level of management (by name, address and position) who participated in the decision to institute such program(s).