

FILE NAME: Hampshire (HAMP)

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Contentious Interrogatories

Hampshire's Answer to Contentions Interrogatories, Albratt
2/1/91

INTERROGATORY NO. 39:

State for any physician or biological scientist ever employed by your firm as a consultant, plant physician or otherwise:

- (a) His or her name and address;
- (b) The dates of employment;
- (c) The duties and responsibilities of each;
- (d) The location, identifying titles or codes, and custodians of all reports or memoranda written by each;
- (e) The professional specialization of each;
- (f) The reason for hiring each such person;
- (g) The name and address of the person in your firm responsible for hiring such person.

ANSWER TO INTERROGATORY NO. 39:

Hampshire objects to this Interrogatory to the extent that it inquires about experts that may have been obtained for the purposes of litigation. Without waiving this objection, Hampshire states that it employed no such personnel.

INTERROGATORY NO. 40:

Have you ever employed or used the services of an "industrial hygienist" or employed or used the services of one as a consultant? Please state for each hygienist:

- (a) The reasons for hiring such a hygienist;
- (b) The location where the hygienist was assigned;
- (c) The duties of the hygienist;
- (d) The names and addresses of the persons hiring such hygienist and of the hygienist;
- (e) The date when each hygienist was first hired.

ANSWER TO INTERROGATORY NO. 40:

Hampshire objects to this Interrogatory to the extent that it inquires about experts that may have been obtained for the purposes of litigation. Without waiving this objection,

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Hampshire states that it employed no such personnel.

INTERROGATORY NO. 41:

Have you contributed any funds to research concerning asbestos and its relation to lung, heart, gastrointestinal and/or larynx disease? If so, please state for each year the amount of money contributed, when and to whom it was contributed, attaching any report or reports from each individual or organization to whom your funds were distributed.

ANSWER TO INTERROGATORY NO. 41:

Hampshire objects to this Interrogatory on the ground that it is over broad in seeking information regarding asbestos research without any relation to the type of asbestos or asbestos-containing products to which Plaintiffs' alleged exposure. Without waiving this objection, no.

INTERROGATORY NO. 42:

Have you conducted, had conducted for you, participated in, cooperated with, or funded any investigation, study, test, review or analysis (hereinafter referred to as "study") concerning asbestos-related diseases, asbestosis, pulmonary diseases or cancer. If so, identify each such study by:

- (a) The date each study was conducted;
- (b) The person authorizing the study;
- (c) The person in charge of the study;
- (d) The people participating in the study;
- (e) The title and subject of the study;
- (f) The results of each study;
- (g) To whom the results of the study were reported or communicated;
- (h) If statistical analyses were made, state the results, describe the data and assumptions upon which the results were based;
- (i) If in writing, either attach a copy of the study or identify it by date, title, identification number, present location and custodian.