

INTERROGATORY NO. 24: Has the Defendant ever been a member of the Industrial Hygiene Foundation or the Industrial Health Foundation? If so:

(a) State the years inclusively of such membership.

(b) State whether any representative of the Defendant was in attendance at the 20th annual meeting of the IHF in November, 1955, in Pittsburgh, Pennsylvania, and, if so, give the name and current address of such attendee.

(c) State whether the Defendant received a copy or copies of the Industrial Hygiene Digest published monthly by the IHF and state the date of initial receipt of such publication.

ANSWER: On information and belief this Defendant has never belonged to either organization, nor do they possess any records of anyone attending the 20th Annual Meeting in 1955. The former Medical Director of Defendant, Dr. Hamlin, held a prior position on an Industrial Hygien Foundation Medical Committee for three years starting in 1952.

INTERROGATORY NO. 25: State whether the Defendant ever requested officials at the IHF to:

(a) Perform a search of the medical literature to determine whether any scientists or doctors were reporting cases of insulation workers with asbestosis and/or lung cancer or discussing the potential hazards incident to use of asbestos containing insulation products.

(b) Perform any studies or research into potential health hazards incident to the use of asbestos containing insulation products.