

1 INTERROGATORY NO. 56:

2 Has the defendant sponsored, since 1930, any meetings, semi-
3 nars, conferences, or conventions where the subject of occupa-
4 tional health and/or exposure to asbestos was discussed?

5 RESPONSE:

6 OBJECTION. Interrogatory No. 56 is objected to on the
7 grounds that it is overly broad, vague, ambiguous, burdensome and
8 seeks information not reasonably calculated to lead to the dis-
9 covery of admissible evidence. Without waiving said objection
10 and, in the spirit of liberal discovery, defendant will respond
11 that it does hold safety meetings at its plants.

12 INTERROGATORY NO. 57:

13 If the answer to Interrogatory No. 56 is in the affirmative,
14 please state:

15 (a) The date and place of such meeting, seminar, con-
16 ference or convention;

17 (b) The name and address of the speakers.

18 RESPONSE:

19 OBJECTION. Interrogatory No. 57 is objected to on the
20 grounds set forth in response to Interrogatory No. 56, which
21 objection is incorporated herein as though fully set forth.

22 INTERROGATORY NO. 58:

23 Has the defendant ever warned any labor union or its repre-
24 sentative of the potential health hazards associated with the use
25 of products containing asbestos?

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