

1 REQUEST FOR ADMISSION LL: You were aware as early as 1960
2 of research, studies and/or articles indicating a causal connection
3 between asbestos exposure and
4

5 (a) asbestosis;

6 (b) lung cancer;

7 (c) mesothelioma;

8 (d) forms of cancer other than lung cancer.

9 RESPONSE: Denied.

10
11
12 REQUEST FOR ADMISSION MM: You were aware as early as 1970
13 of research, studies and/or articles indicating a causal connection
14 between asbestos exposure and
15

16 (a) asbestosis;

17 (b) lung cancer;

18 (c) mesothelioma;

19 (d) forms of cancer other than lung cancer.

20 RESPONSE: Admitted as to (a) and (c). We are unclear as to what you are
21 referencing in (b) and (d) and therefore deny the same.