

FILE NAME: Hampshire (HAMP)

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DOCUMENT DESCRIPTION: Legal - Hampshire's Answers to
Contentious Interrogatories

Hampshire's Answer to Contention Interrogatories
Alvate 2/1/91

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.

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ANSWER TO INTERROGATORY NO. 42:

Hampshire incorporates herein by reference its objection to Interrogatory Number 41. Without waiving this objection, Defendant states that it has not participated in, cooperated with, or funded any investigations, studies, tests, reviews, or analyses.

INTERROGATORY NO. 43:

Have you undertaken or financed any tests or studies to determine what type of ventilator or ventilation system would eliminate or decrease the number of airborne asbestos fibers in confined spaces? If so, state:

- (a) Who made the test or study;
- (b) When was the test or study made;
- (c) What was the result of the study or test;
- (d) To whom the results were reported or communicated;
- (e) If the result was written, identify the document by title, date, file designation and author of each such test or study, and the location and present custodian thereof.

ANSWER TO INTERROGATORY NO. 43:

No.

INTERROGATORY NO. 44:

Have you or has anyone on your behalf attended and/or participated in any conference, seminar, lecture or symposium dealing with the hazards of using any of your asbestos-containing products and, if so, state:

- (a) The date and place of such conference, seminar, lecture or symposium;
- (b) The person or persons conducting such conference, seminar, lecture or symposium;
- (c) The person or persons who attended on your behalf;
- (d) The subject matter of such conference, seminar, lecture or symposium;
- (e) The speakers and/or moderators at such conference, seminar, lecture or symposium;