

1 respect to the terms "warnings," "cautions," "caveats" or "direc-  
2 tions." Without waiving said objection, and in the spirit of  
3 liberal discovery, this defendant will respond that with respect  
4 to cautions concerning asbestos, all asbestos-containing products  
5 manufactured, distributed or supplied by this defendant since  
6 1972, did have warning labels complying with the OSHA mandate.

7 (g) Please refer to objection and response contained  
8 in subpart (f).

9 INTERROGATORY NO. 5:

10 If the answer to Interrogatory No. 3 is no, please  
11 state:

12 (a) From what sources has defendant obtained asbes-  
13 tos-containing products since 1930?

14 (b) Whether any warnings, cautions, caveats or direc-  
15 tions accompanied the material referred to in (a);

16 (c) The nature and extent of said warnings, cautions,  
17 caveats or directions accompanying said asbestos materials;

18 (d) Approximately what date said warnings, cautions,  
19 caveats or directions first appears [sic] on the manufactured  
20 asbestos materials.

21 RESPONSE:

22 Not applicable.

23 INTERROGATORY NO. 6:

24 Has defendant, at any time from 1930 to the present, engaged  
25 in the mining and/or milling of material containing asbestos  
26 fibers?

27 RESPONSE:

28 No.