

1 REQUEST FOR ADMISSION L: You were aware as early as 1979

2 that one or more individuals had filed workmen's compensation
3 claims alleging injury or disease as a result of exposure to
4 asbestos while employed at one or more of your facilities.

5 RESPONSE: Admitted.
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9 REQUEST FOR ADMISSION M: You were aware as early as 1980

10 that one or more individuals had filed workmen's compensation
11 claims alleging injury or disease as a result of exposure to
12 asbestos while employed at one or more of your facilities.

13 RESPONSE: See response to Request for Admission L.
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18 REQUEST FOR PRODUCTION Q: Pursuant to CR 34, attach or
19 produce according to the above instructions annual summaries of
20 compensation claims analyzed by nature of claims, lost time,
21 disposition and the like.

22 RESPONSE: Irrelevant objection.
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