

1 set forth in Response to Interrogatory No. 40, supra, and incor-
2 porates the same by reference herein as though fully set forth.

3 INTERROGATORY NO. 46:

4 Please state whether any of the distributors of defendant's
5 asbestos-containing products were provided with any special in-
6 structions, oral or written, in regard to utilizing said products
7 in a manner so as to avoid exposing workers to dust. If so,
8 please state:

- 9 (a) When these instructions were given;
10 (b) By whom these instructions were given;
11 (c) Whether the instructions oral or written;
12 (d) The precise content of the instructions;
13 (e) If the instructions were written, please attach a
14 copy of the instructions.

15 RESPONSE:

16 OBJECTION. Interrogatory No. 46 is objected to on the
17 grounds that it is overly broad, vague and ambiguous.

18 INTERROGATORY NO. 47:

19 Please state whether any employee of the defendant has ever
20 made a claim for asbestosis under the Occupational Disease or
21 Workers' Compensation Statute of any state. If so, include in
22 your answer:

- 23 (a) The date that the defendant first received notice
24 of any claim for asbestosis under the Occupational Disease or
25 Workers' Compensation Statute of any state and state [sic]; and
26 (b) The total number of claims filed for the years
27 1930 to 1972.

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