

(e) The resulting implementation of the studies by Defendant.

(f) The date when first implemented.

ANSWER: Defendant is not aware of any such organizations. However, Defendant has belonged to numerous organizations over the years and it would be impossible to know everything that each of them did.

INTERROGATORY NO. 20: Please state the amounts spent or contributed by the Defendant annually from 1930 until the present time for,

(a) Research specifically directed to the relationship, if any, between an insulation worker's exposure to asbestos containing insulation products and asbestosis, lung cancer or any other pulmonary disease.

(b) To any independent medical research group or groups conducting research into the relationship, if any, between the exposure of insulation workers to asbestos and any pulmonary diseases.