INTERROGATORY NO. 29:

As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer, state:

(a) The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.

(b) What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers?

(c) The date on which Defendant first suspected other cancers were caused by asbestos inhalation.

(d) Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.

(e) What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(f) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

(g) Who is the custodian of such information.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana. Subject to and without waiving objections, Dana states as follows:

(a) Dana does not know when, if ever, Smith & Kanzler Company or its subsidiary or predecessor first learned that gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer were caused by inhalation of asbestos fibers by humans.

(b) Dana does not know what cancers, if any, Smith & Kanzler Company or its subsidiary or predecessor became aware can be caused by exposure to asbestos fibers.