c) Were the instructions oral or written.

ANSWER: Written.

d) The precise content of the instructions.

ANSWER: See Exhibit B attached.

e) If the instructions were written, please attach a copy.

ANSWER: See Exhibit B attached.

15. Did the Defendant sponsor since 1930 for its employees or distributors any meetings, seminars, conferences, or conventions where the subject of occupational health and exposure to asbestos was discussed.

ANSWER: Yes.

16. If the answer to Interrogatory 15 is in the affirmative, state:

a) The date and place of such meeting, seminar, conference, or convention where the subject of occupational health and exposure to asbestos was discussed.