

1 RESPONSE:

2 Not applicable by virtue of the objection interposed in
3 response to Interrogatory No. 15.

4 INTERROGATORY NO. 17:

5 If the answer to Interrogatory No. 16 is affirmative, please
6 state:

7 (a) The nature of the change made;

8 (b) The name, address, and job classification of each
9 person ordering the change in design.

10 RESPONSE:

11 Not applicable by virtue of the objection interposed in
12 response to Interrogatory Nos. 15 and 16.

13 INTERROGATORY NO. 18:

14 Has defendant, at any time since 1930, published and/or
15 distributed any brochures, sales literature, pamphlets, or other
16 written materials of any kind that contain any warnings, cau-
17 tions, caveats or directions concerning the possibility of injury
18 resulting from the use of the products listed in Interrogatory
19 No. 10, above? If so, identify each brochure, sales literature,
20 pamphlet or other written material and the date of publication
21 and distribution.

22 RESPONSE:

23 Yes. Since 1972, all asbestos-containing products were
24 accompanied by warning labels affixed to the package in which the
25 product was contained. Additionally, documents falling within
26 the scope of this interrogatory were produced by defendant at the
deposition of Charles Mallory in Washington, D.C. on June 11,
1984.