

B38. If your company manufactured any products which contained asbestos and which were commonly used by insulation workers and pipe coverers, describe how the following products were cut, shaped, mixed and applied when used:

ANSWER: Not applicable.

- (a) Asbestos cement;
- (b) Asbestos containing pipe covering;
- (c) Asbestos sheeting;
- (d) Asbestos insulation to cover extremes of heat as well as cold.

B39. Prior to 1964, were there any memoranda written by, distributed or circulated among defendant's employees, agents or representatives concerning the potential health hazards concerned with asbestos containing products? If so, state:

ANSWER: None to our knowledge concerning brake dust.

- (a) Dates of each memorandum;
- (b) Name, address and job position of each individual who wrote each memorandum;
- (c) Name, address and job position of each individual to whom the memorandum was directed;
- (d) Where each memorandum is kept;
- (e) Attach copies of each memorandum hereto.

B40. Has defendant or its predecessor corporations ever had a division, affiliate or subsidiary which was involved in contracting for or installation of asbestos-containing materials in New Jersey? If so, for each such entity involved in the contracting or installation of these products, set forth the following information:

ANSWER: No.

- (a) The Name of each such entity and the nature of its relationship to the parent corporation;
- (b) The exclusive dates that each of the above mentioned entities were in existence.

B41. Did defendant ever provide any of the employees who worked in the contracting of or installation of asbestos containing materials with any respirators, face masks or protective clothing? If so, indicate what types of protective clothing, respirators or face masks were provided, describe when each type was first provided to each employee and describe why they were provided to each type of employee.

ANSWER: Not applicable.