

1 its assembling facility and bonding shops. Wagner has never had
2 an industrial hygienist as an employee.

3 INTERROGATORY NO. 39:

4 Please state if the defendant's medical officers or
5 industrial hygienists ever made any recommendations and/or sug-
6 gestions to the defendant pertaining to the risks or hazards to
persons involved in the manufacturing or use of products con-
taining asbestos? If so, please state:

7 (a) Where were such recommendations and/or sugges-
8 tions made?

9 (b) To whom were such recommendations and/or sugges-
tions made?

10 (c) By whom were these recommendations and/or sugges-
11 tions made?

12 (d) The substance of the recommendations and/or sug-
gestions made?

13 RESPONSE TO INTERROGATORY NO. 39:

14 See Wagner's response to interrogatory No. 36.

15 INTERROGATORY NO. 40:

16 Please state the names of trade association
17 periodicals to which defendant subscribed from 1930 to 1972.

18 RESPONSE TO INTERROGATORY NO. 40:

19 Wagner objects to this Interrogatory to the extent it
20 seeks information outside the Plaintiff's alleged exposure peri-
21 od. Subject to that objection, Wagner states that it has sub-
22 scribed to the periodicals issued by the American Trucking Asso-
23 ciation, American Association of Motor Vehicle Administrators,
24 Automotive Warehouse Distributors Association, Motor equipment
25 Manufacturers' Association, Automotive Service Industry Associa-
26 tion, Automotive Parts and Accessories Association, and the
27 distributors Institute, among others.
28