

INTERROGATORY NO. 27: Did the Defendant ever warn any labor union representing insulation workers, or any union members individually, of any potential health hazard from use of insulation products containing asbestos? If so, state:

- (a) The Union.
- (b) How said Union was informed.
- (c) The date and place of said information or warning.
- (d) The content and nature of said warning.
- (e) The individual or individuals warned.

ANSWER: Defendant objects to this Interrogatory as irrelevant in that insulation products are not involved in this lawsuit.

INTERROGATORY NO. 28: Has any investigation or other reports been prepared, compiled, submitted or made by or on your behalf in this action? If so, describe each document dealing with each such investigation or report.

ANSWER: No.