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Interrogatories Baltimore County

Hampshire's Answers to Interrogatories Baltimore County
11/1/88

or procedure and what action, if any, was taken by you in response to the findings made as a result of said practice or procedure.

ANSWER TO INTERROGATORY NO. 37:

No. Prior to the early 1970's, this Defendant reasonably relied upon the superior knowledge and on the information supplied to it by said manufacturers and/or suppliers of its manufacturers and/or suppliers of the material it purchased.

INTERROGATORY NO. 38:

State whether you ever conducted or directed any studies designed to learn how to minimize or eliminate the inhalation and ingestion of asbestos dust and fibers by those who use your asbestos products or are exposed to asbestos dust or fibers therefrom.

ANSWER TO INTERROGATORY NO. 38:

This Defendant was a user of products manufactured or mined by others, and relied upon the superior knowledge of its manufacturers and/or suppliers and on the information supplied to it by said manufacturers and/or suppliers of the material it purchased. This Defendant did not conduct any such studies.

INTERROGATORY NO. 39:

Identify all trade organizations, associations or other entities to which you belong or belonged. Said organizations, etcetera, include, at a minimum, the following:

Asbestos Textile Institute (ATI); Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF); Mineral Wool Institute; Industrial Mineral Insulation Manufacturers Institute, Magnesia Silica Insulation Manufacturers Association, National Insulation Manufacturers Association (NIMA); Thermal Insulation Manufacturers Association (TIMA); Asbestos Information Association (AIA); Quebec Asbestos Mining Association (QAMA); National Safety Council, Asbestos Cement Producers Association; Refractories Institute.

ANSWER TO INTERROGATORY NO. 39:

Defendant was or is presently a member of the Contractors, Plasterers, Lathers International Association, now known as The

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Association of Wall and Ceiling Contractors: The International Association of Wall and Ceiling Contractors, The Ceilings International Systems Contractors Association, and The Association of General Contractors.

INTERROGATORY NO. 40:

For each trade organization, association or other entity identified in your Answer to Interrogatory No. 39. state:

- (A) Dates of membership;
- (B) Type of membership, i.e., regular or associate;
- (C) The dates and type of meetings you attended and the identity of the individuals who attended such meetings on your behalf;
- (D) The identity, title, duties and responsibilities of any individual who held an elected, appointed or self-designated position within said organization, etcetera;
- (E) The names of any publications or written materials distributed by or on behalf of said organization, etcetera; and
- (F) The identity of the present custodian of all written materials, notes, summaries, minutes or transcripts relating to the transactions and proceedings of said organization, etcetera.

ANSWER TO INTERROGATORY NO. 40:

Defendant objects to this Interrogatory on the grounds that it is not calculated to lead to the discovery of admissible evidence, and is overly broad, vague, burdensome in its scope, and lacks relevance to the particularities of the case at bar.

INTERROGATORY NO. 41:

For each trade organization, association or other entity identified in your Answer to Interrogatory No. 39, identify all studies, tests, research, recommendations, suggestions, seminars, symposia and/or speeches conducted or made which concerned, discussed, addressed or dealt with the actual, alleged or possible health hazards associated with exposure to asbestos.

ANSWER TO INTERROGATORY NO. 41:

Defendant is unaware of any studies, test, research, recommendations, suggestions, seminars, symposia or speeches

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