INTERROGATORY NO. 27.:

As to pleural disease, pleural thickening or pleural plaques, state:

A. The date on which Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans.

B. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.

C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

F. Who is the custodian of such information.

ANSWER: See Answer to Interrogatory No. 25.

INTERROGATORY NO. 28.:

As to the disease mesothelioma, state:

A. The date on which Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans.

B. The date on which Defendant first suspected the mesotheliomas was caused by inhalation of asbestos dust and fibers.

C. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.

D. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.