cancer and asbestosis." Further, the interrogatory in its present form seeks a medical opinion which this defendant is incapable of rendering.

INTERROGATORY NO. 77:

Has defendant ever subscribed to or received the United States Public Health Bulletin service? If your answer is in the affirmative, please state the dates defendant received the Public Health Service Bulletin.

RESPONSE:

No.

INTERROGATORY NO. 78:

Please state the date defendant first notified its employees working in manufacturing plants and factories of the need to wear and use respirators.

RESPONSE:

OBJECTION. Interrogatory No. 78 is objected to on the grounds that it is overly broad, vague, and ambiguous. Without waiving said objection, and in the spirit of liberal discovery, defendant responds that it does not afford respirators to its workers who handle asbestos, but face masks have been made available since the early 1970's.

INTERROGATORY NO. 79:

Please state the date when defendant first notified users of its asbestos-containing products of the need to wear respirators.

RESPONSE:

Defendant incorporates its objection and response set forth in response to Interrogatory No. 69, above.

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