

only to impose an undue burden upon Defendant. Subject to and without waiving the foregoing objections, no. Air sampling was conducted in 1975, as stated in response to Interrogatory No. 8, which response is incorporated herein as if restated verbatim.

46. If Defendant performed or had performed any dust level counts, what action, based on the results, did your company take?

ANSWER:

Defendant objects to this interrogatory because it is duplicative of other interrogatories herein and it seeks only to harass, oppress and impose undue burden upon Defendant. Further, it is vague, overly broad, general and global. The interrogatory also seeks information which is not reasonably calculated to lead to the discovery of admissible evidence and which is neither relevant nor material to any issue in this case. Finally, the interrogatory seeks information which is protected by the attorney work product, investigative and third-party communication privileges set forth in Rule 166b of the Texas Rules of Civil Procedure. Subject to and without waiving the foregoing objections, please see Defendant's responses to Interrogatory Nos. 8, 10, 11, 13, and 45, which responses are incorporated herein by reference as if restated verbatim.

47. Has your company or its or its subsidiaries or predecessor(s) ever conducted or caused to be conducted any studies designed to assist in minimizing or eliminating the inhalation of asbestos dust and fibers by those exposed to the use of your company's products? If so, give the following:

- (a) Name of the person or firm conducting such studies;
- (b) The date the studies began and the date they were completed;
- (c) Any publication or other written dissemination of the results of the studies;
- (d) The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers.

ANSWER:

Defendant objects to Interrogatory No. 47 to the extent it inquires of "predecessor companies" without identifying or defining such. Moreover, the