RESPONSE: Denied.

REQUEST FOR ADMISSION J: You were aware as early as 1970 that one or more individuals had filed workmen's compensation claims alleging injury or disease as a result of exposure to asbestos while employed at one or more of your facilities.

RESPONSE: Denied.

REQUEST FOR ADMISSION K: You were aware as early as 1975 that one or more individuals had filed workmen's compensation claims alleging injury or disease as a result of exposure to asbestos while employed at one or more of your facilities.

RESPONSE: Denied.