

INTERROGATORY NO. 20:

Did Defendant ever provide information to a military or other governmental entity that was used or intended to be used in drafting military specifications for the design of asbestos-containing products? If so, for each entity:

- (a) State the name of the entity;
- (b) Describe the information provided; and
- (c) Give the dates on which the information was provided.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana. Subject to and without waiving objections, Dana does not know whether Smith & Kanzler Company ever provided information to a military or other governmental entity that was used or intended to be used in drafting military specifications for the design of asbestos-containing products.

INTERROGATORY NO. 21:

Did any employee or agent of Defendant ever receive a copy of any of the following articles? If so, for each article, state the name of the recipient and the date the article was received:

- (a) WALDEMAR DREESSEN, "A Study of Asbestosis in the Asbestos Textile Industry," U.S. Treasury Dept. Public Health Bull. No. 241, August, 1938.
- (b) WALTER FLEISCHER, PHILLIP DRINKER, et al., "Health Survey of Pipe Covering Operations in Constructing Naval Vessels," Journ. Industrial Hyg. & Tox. 28:9 (1946).
- (c) RICHARD DOLL, "Mortality from Lung Cancer in Asbestos Workers," Brit. J. Industr. Med. 12: 81-86 (1955).
- (d) E.R.A. MEREWETHER, "The Occurrence of Pulmonary Fibrosis and Other Pulmonary Affections in Asbestos Workers," J. Ind. Hyg., Vol. XII (1930).

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is