

dust.

ANSWER: - Not to answering defendant's knowledge.
Please see documents provided.

INTERROGATORY NO. 35:

State the date on which any official of Defendant and/or any predecessor/related entity first had knowledge, notice, information or understanding that exposure to asbestos would, could or might cause each of the following diseases:

- (a) Pleural disease;
- (b) Asbestosis;
- (c) Mesothelioma;
- (d) Lung cancer; and,
- (e) Any other forms of cancer.

ANSWER: - Answering defendant has general knowledge that some asbestos containing materials can cause disease. Such knowledge was learned some time in the mid 1980s when the hazards of asbestos were made public.

INTERROGATORY NO. 36:

With respect to each disease set forth in Interrogatory No. 35:

- (a) Identify the manner in which defendant and/or any predecessor/related entity first obtained said knowledge, notice, information or understanding;
- (b) Identify any and all documents referring to, relating to or reflecting the receipt of such knowledge, notice, information or understanding; and,
- (c) Describe what, if any, actions defendant and/or any predecessor/related entity took in response to such knowledge, notice, information or understanding.