a purely mechanical pathogenesis of asbestos cancer, but they concede that the development of so-called asbestos warts proves the irritating effect of asbestos on human tissues." See Exhibit O *(SC-ALLF-01760)*.

(d) In the April 1957 issue of Industrial Hygiene Digest, an article by Lynch, McIver and Cain entitled "Pulmonary Tumors in Mice Exposed to Asbestos Dust" is discussed in Abstract No. 506; said abstract states: "The equivocal nature of this report does not answer the questions raised by accumulating clinical evidence that asbestosis is strongly associated with, and therefore is a possible cause of, pulmonary carcinoma in man." See Exhibit P *(SC-ALLF-01830)*.

(e) In the August 1960 issue of Industrial Hygiene Digest, an article by Anderson and Campagna entitled "Asbestosis and Carcinoma of the Lung" is discussed in Abstract No. 781; said abstract states: "A case of asbestosis associated with carcinoma of the lung is presented. The literature is reviewed, and this is the 24th reported case, with complete autopsy findings. In general, it conforms to the previously described cases where a relationship between the 2 diseases is intimated." See Exhibit Q *(SC-ALLF-02040)*.

(f) In the March 1961 issue of Industrial Hygiene Digest, a British study of asbestos deaths from 1948 to 1953 at the London Hospital and article by Real entitled "Asbestosis and Abdominal Neoplasms" was discussed in Abstract No. 270; said abstract described the various cancers found and stated: "Some evidence of hematogeneous spread of asbestos fibers was adduced and it was suggested that a combination of mechanical and chemical factors may determine the peritoneum as the site of inflammatory and subsequent neoplastic change. No single satisfactory explanation for these cases could be drawn from the available material though they appeared to form a clinical entity of statistical significance." See Exhibit R *(SC-ALLF-02140)*.

9. Dr. Charles Blackwell, Jr., who was hired by Abex in 1961 and became medical director in 1976, has testified that he, and therefore Abex, were aware of the health hazards of asbestos, including mesothelioma, since he came to Abex. *See excerpt's from Nov. 1984 Blackwell deposition, Exhibit S hereto, pp. 12-13.* Specifically:

(a) Blackwell knew from medical school that asbestos was hazardous and that it was associated with mesothelioma, a rare tumor. *See Ex. S, pp. 24-28.*

(b) Blackwell in a letter to the Personnel Management Dept. at Abex on October 20, 1964 reported the results of Selikoff's study published in the April 1964 issue of the Journal of the American Medical Association. Blackwell states, "On the basis of their study, it would appear that there is an added relationship between cancer of the lungs, pleura, stomach, colon and rectum in individuals who have been asbestos workers for 20 or more years.....these authors found 6.8 times as much cancer of the lung and pleura as in the general U.S. male population." See Exhibit T *(SC-ABEX-0910)*.