

RESPONSE TO MASTER INTERROGATORY 33:

See Preliminary Statement and General Objections.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving objections, in approximately February of 1985, Victor began inserting a caution label with its finished gaskets. That label read substantially as follows: "This material contains asbestos. Avoid creating dust. Follow OSHA work practices, including use of appropriate dust containment equipment. Inhalation may cause asbestosis or other serious bodily harm. Smoking greatly increases the risk of bodily harm." This cautionary label remained essentially unchanged and was discontinued in 1988. See attached photocopy of sample label.