INTERROGATORY NO. 18: Please state the names of trade association periodicals to which the Defendant subscribed from 1930 to the present date. State whether or not the Defendant had any knowledge of any articles being printed in industry trade journals essays, memoranda and other similar sources pertaining to the hazardous potentials of asbestos and which of such articles were received by you.

ANSWER: Defendant objects to this Interrogatory as overbroad and burdensome. There are countless periodicals and articles and it would be unduly burdensome to search all of these.

INTERROGATORY NO. 19: Please state organizations, groups, inter-company or industrial organizations to which the Defendant belongs which conducted studies or researched the relationship, if any, between exposure to asbestos fibers or products and asbestosis and lung cancer from 1930 to present. For each group, please state:

(a) The type or nature of the duties.

(b) When the studies were conducted.

(c) The complete results of the studies.

(d) The recommendations of the studies.