

its facilities from the years 1930 until the present time.

RESPONSE:

OBJECTION. Interrogatory No. 37 is objected to on the grounds that it is overly broad, burdensome, and oppressive. Without waiving said objection, and in the spirit of liberal discovery, this defendant responds that the following are plant physicians for those plants which use or have used asbestos in the recent past:

(1) Friction Products Division, Winchester, Virginia:
Harvey E. Melton, M.D., 522 Amherst Street, Winchester, Virginia 22601. Dr. Melton has been plant physician for many years;

(2) Friction Products Division, Salisbury, North Carolina:
Harold H. Newman, M.D., 516 Mocksville Avenue, Salisbury, North Carolina 28144; Dr. Newman was the plant physician from 1975 to 1980. John M. Blount, M.D., 1927 West Innes, Salisbury, North Carolina 28144, has been the plant physician from 1980 to the present;

(3) Railroad Products Division, Chicago, Illinois: R. D. Phillips, M.D., Zayas Clinic, 4206 West 26th Street, Chicago, Illinois 60623.

INTERROGATORY NO. 38:

Please list the names and addresses of all persons employed by defendant from 1930 until the present time who functioned as industrial hygienists. (As contemplated by these Interrogatories, an industrial hygienist is one that performs engineering or health studies to identify and evaluate potential occupational health hazards and suggests methods of dealing with same.) Include in your answer to the foregoing:

4 OFFICES 27
& COSTANZO
CORPORATION
FLOOR 28
BOULEVARD
210-1161
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