

1 RESPONSE:

2 No.

3 INTERROGATORY NO. 62:

4 Please state whether defendant ever subscribed to the Asbes-
5 tos magazine and list the dates of subscription.

6 RESPONSE:

7 No.

8 INTERROGATORY NO. 63:

9 Please identify all booklets, manuals, journals and publica-
10 tions provided to the recipients of any asbestos-containing prod-
11 ucts manufactured, sold or distributed by defendant regarding the
12 proper use and application of products. Include in your answer
13 the dates said information was provided.

14 RESPONSE:

15 OBJECTION. Interrogatory No. 63 is objected to on the
16 grounds that it is overly broad, vague, ambiguous, burdensome and
17 seeks information which is not reasonably calculated to lead to
18 the discovery of admissible evidence.

19 INTERROGATORY NO. 64:

20 Please identify and describe in detail all tests and experi-
21 ments conducted by defendant to determine whether or not asbestos
22 contained within its asbestos-containing products would become
23 airborne with normal use. Include in your answer the dates,
24 results and conclusions of each test and/or experiment.

25 RESPONSE:

26 OBJECTION. Interrogatory No. 64 is objected to on the
27 grounds that it is overly broad, vague, ambiguous and
28 unintelligible.