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Hampshire's Answers to Master Interrogatories, Answer 8/24/93

(A) The manner of communicating with employees about such program;

(B) Whether examination was optional or mandatory and, if the latter, how frequently such examination was required;

(C) What percentage of employees permitted to undergo such examination actually participated;

(D) What percentage of employees who underwent such medical examination were found to have pneumoconiosis, asbestosis, mesothelioma, lung cancer or other cancers; and

(E) With respect to the employees referred to in your Answer to Part (D) of this Interrogatory, what percentage of these employees were paid disability, and/or worker's compensation benefits and for what percentage of employees were medical expenses paid for purposes of treatment of such condition.

ANSWER TO INTERROGATORY NO. 31:

None.

INTERROGATORY NO. 32:

State whether you or anyone on your behalf ever conducted, engaged in or participated in any tests, studies and/or research concerning the human health consequences of persons coming in contact with and/or inhaling asbestos fibers or asbestos dust during the manufacture and/or use of asbestos products. If so, identify:

(A) What tests, studies and/or research were done;

(B) When said tests, studies and/or research were done:

(C) The individuals who ordered and supervised the tests, studies and/or research;

(D) The individuals or groups engaged in or participating in the tests, studies and/or research;

(E) The substance of any recommendations and/or suggestions given as a result of the tests, studies or research. State when, by whom and to whom said recommendations were made, including the addresses of these individuals;

(F) All written documents including, but not limited to, reports, memoranda, specifications and correspondence which refer, relate or pertain to said tests, studies and/or research; and

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(G) The present custodian of the written documents identified in your Answer to Part (F) of this Interrogatory.

ANSWER TO INTERROGATORY NO. 32:

No.

INTERROGATORY NO. 33:

State whether any of the medical directors, industrial hygienists, physicians, biological scientists or consultants in these fields identified in your Answer to Interrogatory No. 30 ever made any recommendations and/or suggestions to you pertaining to the risks or hazards to persons involved in the manufacture or use of asbestos products. If so, identify:

(A) The date when said recommendations and/or suggestions were made;

(B) The individual to whom said recommendations and/or suggestions were made;

(C) The individual who made said recommendations and/or suggestions;

(D) The substance of the recommendations and/or suggestions; and

(E) What actions, if any, were taken by you as a result of said recommendations and/or suggestions; and

(F) If no action was taken by you as a result of said recommendations and/or suggestions, state the reason(s) why and the person(s) responsible for making that decision.

ANSWER TO INTERROGATORY NO. 33:

See Answer to Interrogatory No. 30.

INTERROGATORY NO. 34:

State whether you have ever conducted or directed any investigations or studies to determine the amount of airborne dust containing asbestos fibers in your facilities where asbestos products were mined, milled, manufactured, produced, fabricated, converted, processed, stored, used, handled, installed or removed. If identify:

(A) The date of each such dust count or sampling;