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Hampshire's Answers to Interrogatories, Baltimore County
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ANSWER TO INTERROGATORY NO. 29:

See Answer to Interrogatory No. 28.

INTERROGATORY NO. 30:

Describe your corporate structure concerning medical directors, industrial hygienists or consultants in these fields from 1930 to the present. In your Answer to this Interrogatory, identify the name, title, duties, responsibilities, period of employment, to whom the individual reported, and the current or last known business and residential address of each medical director, industrial hygienist or consultant of yours, or of your predecessor(s) in interest or subsidiary(ies), if any.

ANSWER TO INTERROGATORY NO. 30:

Defendant has never maintained a medical department, or an industrial hygiene division or any related consultants.

INTERROGATORY NO. 31:

Identify any medical examination program offered or sponsored by you or your insurance carrier, from 1930 to the present, for employees handling or otherwise exposed to asbestos and/or asbestos products. With respect to each such program, indicating applicable time periods, state:

(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

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PLAINTIFF'S EXHIBIT HAMP-143

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