

1 RESPONSE TO INTERROGATORY NO. 37:

2 Wagner objects to this Interrogatory on the grounds
3 that it is overly broad and seeks information outside the plain-
4 tiff's alleged period of exposure to asbestos-containing prod-
5 ucts. Subject to this objection, Wagner states that during the
6 plaintiff's alleged exposure to asbestos-containing products,
7 Wagner retained physicians for the purpose of examining Wagner's
8 employees. These physicians are:

9 Douglas A. Ries, M.D. (deceased)

10 Curtis A. Meyer, M.D. (deceased)

11 John J. Keenoy, M.D. (deceased)

12 Lance D. Gerowin, M.D.

13 INTERROGATORY NO. 38:

14 Please list the names and addresses of all persons
15 employed by defendant from 1930 until the present time who func-
16 tioned as industrial hygienists. (As contemplated by these
17 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:

18 (a) The facility or office to which the individuals
19 were assigned;

20 (b) A detailed description of their duties and re-
21 sponsibilities.

22 RESPONSE TO INTERROGATORY NO. 38:

23 Wagner objects to this Interrogatory on the grounds
24 stated in its response to Interrogatory No. 37. Subject to this
25 objection, Wagner states that from 1975 through the end of
26 Plaintiff's alleged exposure period, it has used the consulting
27 industrial hygiene services of John A. Jurgiel, Certified Indus-
28 trial hygienist, 2092 Concourse Drive, St. Louis, Missouri for