

1 INTERROGATORY NO. 70:

2 Please state the manner in which the asbestos-
3 containing products manufactured by defendant were arced since
4 1930.

4 RESPONSE TO INTERROGATORY NO. 70:

5 See Wagner's response to Interrogatory No. 69.

6 INTERROGATORY NO. 71:

7 Is defendant aware of articles authored by W. C. Dres-
8 sen in Public Health Bulletin No. 241 of 1938, establishing
9 threshold limit values for airborne asbestos fibers? If so,
when did defendant first learn of the above-mentioned article?

10 RESPONSE TO INTERROGATORY NO. 71:

11 No.

12 INTERROGATORY NO. 72:

13 Please state when defendant obtained any information
14 concerning the likelihood of asbestos being hazardous to one's
health. Include in your answer how defendant first obtained
this information.

15 RESPONSE TO INTERROGATORY NO. 72:

16 Wagner objects to this Interrogatory on the grounds
17 that it assumes facts not established. Wagner states that it
18 first became aware of the possibility that inhalation of asbes-
19 tos fibers may be harmful to the health of brake mechanics in
20 1976. During 1976, Wagner received a letter informing it of
21 this possibility from the United States Government Department of
22 Health, Education and Welfare, from an article in the May 1976
23 issue of Brake & Front End Magazine entitled "Know and under-
24 stand the law -- OSHA will soon be around," and from materials
25 received from the National Institute for Automobile Service
26 Excellence, among others.

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