

B34. If any employee or officer of defendant has testified at trial or by deposition in any litigation involving any alleged occupational exposure to asbestos, state:

ANSWER: None.

(a) Name, address and title of each such person who testified;

(b) Date, location and form of testimony;

(c) Whether defendant has a copy of such testimony.

B35. Has defendant at any time since its inception, maintained any office or department dealing with medical research? If so, state:

ANSWER: No.

(a) The name of each such department;

(b) The dates each such department was in operation;

(c) The name, address and job position of each such person who has been in charge of said department or departments.

B36. When was the first time the defendant became aware of or knowledgeable of any disease or illness associated with or causally related to the inhalation of asbestos, asbestos fibers or asbestos dust in any form whatsoever? Indicate which disease defendant became aware of and describe how defendant became aware of its alleged relationship to inhalation or exposure to asbestos.

ANSWER: In the 1930's Chrysler recognized that raw asbestos fiber inhalation in large quantities could cause or contribute to pulmonary disease.

B37. In reference to the preceding interrogatory, if defendant acknowledges a causal relationship between asbestos and disease or illness, set forth the following information:

ANSWER: Chrysler Motors Corporation does not acknowledge a causal relationship between exposure to brake dust and disease or illness.

(a) What diseases or illnesses defendant acknowledges are causally related to or associated with exposure to asbestos dust or fibers;

(b) The date upon which defendant became aware of the association with or causal relation to each such disease or illness;

(c) The date upon which defendant confirmed the causal relation of each such disease to exposure to asbestos dust or fibers;

(d) How defendant became aware of each such causal relationship or association, indicating the source of all such information.