

ANSWER: See answer to interrogatory No. 29.

31. If the answer to the above interrogatory is in the affirmative, identify the following:

(a) The name and title of the person authorizing the correspondence;

(b) The date of each correspondence;

(c) Whether or not a copy of the correspondence is presently retained by this defendant or its representatives;

(d) The name and address of the custodian of such correspondence.

ANSWER: See answer to interrogatory No. 30.

32. From 1930 until the present, identify the individual(s) who are or were the most knowledgeable concerning the specific categories which follow, and indicate the period of time over which such person was most knowledgeable. If the most knowledgeable person is deceased or is no longer in your employ, please state his or her name and last known address and also, the name of the most knowledgeable person who is in your employ:

(a) Medical policy, practices and procedures, preventive occupational medicine or industrial hygiene;

(b) Asbestos product safety;

(c) Knowledge of actual, alleged or possible health effects associated with exposure to asbestos fibres or products;

(d) Warnings to direct or indirect purchasers, employees, users, employers, and other individuals such as husband or wife plaintiffs concerning the health effects of asbestos, protective equipment to be worn or used when exposed to asbestos, and the proper method for handling asbestos;

(e) Actions taken to protect direct or indirect purchasers, employees, users, employers, and other individuals such as husband or wife plaintiffs from the adverse health effects of asbestos;