

1 product identified in their answers, asbestos-
2 containing products, and the contraction by humans or
3 animals of cancers and if not limited to mesothelioma
4 and if so, identify by various things; and their
5 answer was no. However, a study was done regarding
6 asbestosis and asbestos exposure in their Berlin plant
7 in 1970.

8 The next was, have they undertaken or
9 financed any studies to determine what type of
10 respirator and/or protective mask would either
11 eliminate or afford maximum protection against the
12 inhalation of asbestos fibers; and their response was
13 to the best of their knowledge, they did not undertake
14 or finance any such studies.

15 The next is interrogatory which asked
16 whether they performed adequate tests of the safety of
17 the asbestos products identified in their answers to
18 interrogatories stating all facts and identifying the
19 documents which form the basis, and their response was
20 that they did not perform, direct to be performed,
21 finance, or sponsor any of the aforementioned