

11. Abex was a member of the National Safety Council although it has failed to disclose its years of membership in discovery. *See Exhibit CC* showing membership as early as 1940-1941 (SCF-ALLF-00655). As a member, Abex should have received and/or should have been aware of the following publications by the National Safety Council ("NSC"):

- (a) In the 1932 edition of NSC Transactions (*See Exhibit DD*; SCF-ALLF-00210) –
 - “The Effects of Inhaled Mineral Dusts” by Leroy Gardner, which specifically discussed health hazards of asbestos.
 - “Clinical and Statistical Aspects of Silicosis” by Albert Russel, which discussed dust hazards in more general terms and referenced the early studies of the infamous Dr. Lanza
 - “Methods of Protecting the Worker Against Dust Inhalation” by Philip Drinker
- (b) In the 1933 edition of NSC Transactions (*See Exhibit EE* ; SCF-ALLF-00240)–
 - “How to Determine the Dust Content of the Atmosphere in Dusty Industries” by E.G. Meiter (an insurance doctor, who stated that action was needed to counteract workers compensation claims and law suits)
 - “Discussion of Dust Problems” by Leonard Greenburg
- (c) In the 1934 edition of NSC Transactions (*See Exhibit FF*; SCF-ALLF-00265)–
 - “Types of Dust That Cause Occupational Diseases” by Gardner, which stated “asbestos does cause the formation of scar tissue in experimental animals and in the human lung” and “the only other type of dust which is generally recognized as a cause of severe pulmonary injury is asbestos.”
- (d) In the 1936 edition of NSC Transactions (*See Exhibit GG*; SCF-ALLF-00375) -
 - “The Lesser Known Facts About Common Occupational Diseases” by Robert B. Hunt, which stated, “the exposure to asbestos fibers, present in the weaving and grinding of dry asbestos material, offers another type of dust which may cause fatalities among workers.”
 - “Respiratory Protective Equipment for Use Against Dusts, Fumes and Gases” by Drinker.
- (e) In the February 1948 issue of National Safety News, there was an article by V. J. Castrop, entitled “Fume and Dust Exposure” (*See Exhibit HH*; SCF-ALLF-01045).