INTERROGATORY NO. 16: Please state if the Defendant or anybody on behalf of the Defendant ever conducted or sponsored or contributed financially to any studies or research to determine if the inhalation of asbestos fibers may be harmful. If so, please state:

(a) Identify each person by whom the research was conducted.

(b) The dates that each such test was conducted.

(c) The complete results of each test or study.

(d) Supply copies of reports or identify each document of the research department pertaining to the use by the corporation of asbestos in their manufactured insulation products.

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