

reports from each individual or organization to whom your funds were contributed.

Ans. Goodyear follows document retention policies which provide for the periodic and routine destruction of documents. Consequently, it has been unable to locate any documents which would enable it to answer this Interrogatory, but it will supplement this response in the event such documents should be found. To the best of Goodyear's present information and belief, the answer to this Interrogatory is No.

50. Did you in any way assist or participate in the 1929 Metropolitan Insurance Company study of asbestos? If so:

- (a) State what role or action you took.
- (b) Identify all documents by name, date, title, file number and present location.

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51. State whether from 1930 to 1972 defendant has promulgated any rules, written or oral, for the handling of asbestos products by its own employees? If so, state:

- (a) When such rules were promulgated.
- (b) The substance of the rules, if oral, and the name, address and title of the person who disseminated them.
- (c) If in writing, either attach a copy of the rules or identify the written rules by date, title, identification, number, present location and the name and address of the custodian thereof.
- (d) Whether any such material was provided to Pearl Harbor or any entity in Hawaii or any other company and, if so, when and to whom.