

INTERROGATORY NO. 17: Please state if the Defendant's medical officers or industrial hygienists ever made at any time any recommendations and/or suggestions to the Defendant pertaining to the risks or hazards to persons involved in the manufacturing or use of insulation products containing asbestos? (As contemplated by these Interrogatories, an industrial hygienist is one who performs engineering or health studies to identify and evaluate potential occupational health hazards and suggest methods of dealing with same.) If so, please state:

(a) Identify each document pertaining to such recommendations and/or suggestions.

(b) The substance of the recommendations and/or suggestions.

ANSWER: Defendant objects to this Interrogatory as irrelevant as "insulation products" are not involved in this lawsuit, and the term is not defined.