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2 REQUEST FOR ADMISSION EE: You conducted or caused to be
3 conducted no tests before 1970 on your products containing asbestos
4 to determine whether asbestos or asbestos particles might be
5 harmful to human beings if inhaled.

6 RESPONSE: Admitted.
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11 4.16 State in detail when you first became aware of the
12 existence of articles on the subject of the relationship between
13 asbestos exposure and

14 (a) asbestosis;

15 (b) lung cancer;

16 (c) mesothelioma;

17 (d) forms of cancer other than lung cancer.

18 ANSWER: S. K. Wellman is aware of such articles, but cannot identify when
19 knowledge of such articles first came to the attention of its employees.
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23 4.17 For each disease mentioned in subparts a through d of
24 the preceding interrogatory, state in what manner you gained
25 awareness of each.
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