INTERROGATORY NO. 29: Do you, your agents, employees or representatives know of any statement having been made by the Plaintiff or the other Defendants pertaining to any circumstances of the illness which is the subject of this lawsuit? If so:

(a) Please identify each person having knowledge of the statement.

(b) State the substance of the statement and whether it was written or oral.

(c) Identify each document regarding the statement.

ANSWER: Testimony of Plaintiff at arbitration of workmen's Compensation claim, and his deposition in this cause.

INTERROGATORY NO. 30: Please describe and identify all tests and experiments conducted by you to determine whether or not asbestos fibers contained within your asbestos containing products would become airborne upon any foreseeable application of said products. Please state the dates of all tests and experiments and the results and conclusions of each test and/or experiment.

ANSWER: None.