

1 RESPONSE:

2 OBJECTION. Interrogatory No. 69 is objected to on the
3 grounds that it is overly broad, vague, ambiguous and unintelli-
4 gible. Without waiving said objection, and in the spirit of
5 liberal discovery, defendant refers the plaintiff to Exhibit "C"
6 appended to these answers to interrogatories.

7 INTERROGATORY NO. 70:

8 Please state the manner in which the asbestos-containing
9 products manufactured by defendant were arched since 1930.

10 RESPONSE:

11 OBJECTION. Interrogatory No. 70 is objected to on the
12 grounds that it is overly broad, vague, ambiguous and unintelli-
13 gible with respect to the use of the undefined word "arched."
14 Additionally, the interrogatory calls for information which is
15 not reasonably calculated to lead to the discovery of admissible
16 evidence.

17 INTERROGATORY NO. 71:

18 Is defendant aware of articles authored by W. C. Dressen in
19 Public Health Bulletin No. 241 of 1938, establishing threshold
20 limit values for airborne asbestos fibers? If so, when did de-
21 fendant first learn of the above-mentioned article?

22 RESPONSE:

23 Articles by W. C. Dressen established threshold limit values
24 for airborne asbestos particles, not specifically fibers. ABEX
25 became aware of the articles published in the "Criteria for a
26 Recommended Standard Occupational Exposure to Asbestos" from the
27 U.S. Department of Health, Education, and Welfare, Public Health

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