

1 (d) Review governmental publications of Great Britain
2 to determine whether the Chief Inspector of Factories or any
3 other British Government agency had issued any regulations or
published any findings relative to potential health hazards
incident to the use of products containing asbestos.

4 RESPONSE TO INTERROGATORY NO. 55:

5 No, to the best of Wagner's knowledge.

6 INTERROGATORY NO. 56:

7 Has the defendant sponsored, since 1930, any meetings,
8 seminars, conferences, or conventions where the subject of occu-
pational health and/or exposure to asbestos was discussed?

9 RESPONSE TO INTERROGATORY NO. 56:

10 In its training meetings prior to 1976, instructions
11 on using Wagner products in a manner to avoid exposure to dust
12 were discussed as an incident to stressing the desirability of a
13 clean working environment. In the schools held in 1976 through
14 the present, minimization of dust creation was discussed in
15 regard to minimizing the workers' potential exposure to free
16 asbestos fiber.

17 INTERROGATORY NO. 57:

18 If the answer to Interrogatory No. 56 is in the affir-
19 mative, please state:

20 (a) The date and place of such meeting, seminar,
conference or convention;

21 (b) The name and address of the speakers.

22 RESPONSE TO INTERROGATORY NO. 57:

23 Wagner objects to this Interrogatory on the grounds
24 that it is overly broad, unduly burdensome and not calculated to
25 lead to the discovery of admissible evidence.

26 INTERROGATORY NO. 58:

27 Has the defendant ever warned any labor union or its
28 representative of the potential health hazards associated with
the use of products containing asbestos?