

See Answer to Interrogatory No. 89, which is incorporated herein as if fully rewritten. Buyer considers employee medical information to be (or may be) confidential under federal law. Defendant currently is aware of one unconfirmed statement by a former employee, on November 15, 1989, that he thought he had asbestosis.

INTERROGATORY NO. 92:

For each employee referenced in your Answer to Interrogatory No. 91, state the date that Defendant first knew, or had notice or information, that such past or present employee [who claims he/she] was suffering, or had suffered from:

- (a) asbestosis;
- (b) lung cancer;
- (c) mesothelioma.

ANSWER:

See Answer to Interrogatory No. 91, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 93:

Identify any and all material safety data sheets concerning the products listed in response to Interrogatory Nos. 19 and 42 prepared, at any time, by, or on behalf of, Defendant, any predecessor or any related company.

ANSWER:

See Answer to Interrogatory No. 63, which is incorporated herein as if fully rewritten. MSDS's were provided to customers upon request. One document suggests that, in the mid-1980's,