

(c) State the names and addresses of the organizations or groups conducting the studies referred to in answers to (a) and (b).

ANSWER: Defendant objects to this Interrogatory as irrelevant in that no insulation products are alleged to be involved here.

INTERROGATORY NO. 21: Please state whether the Defendant has a department, division or section devoted to scientific and/or medical research during the period from 1930 until the present time. If so, please state when it was first formed.

ANSWER: Defendant had no department, division or section devoted to research of asbestos exposure.