How many past or present employees of defendant and/or any predecessor/related entity are known by defendant to be suffering from, to have suffered from, or to have suffered deaths caused by:

(a) Asbestosis?

(b) Lung cancer?

(c) Mesothelioma?

ANSWER: - To answering defendant's knowledge, none.

INTERROGATORY NO. 41:

For each employee referenced in defendant's answer to Interrogatory No. 40, state the date that defendant and/or any predecessor/related entity first knew, or had notice or information, that such past or present employee was suffering, or had suffered from:

(a) Asbestosis;

(b) Lung cancer;

(c) Mesothelioma.

ANSWER: - See response to Interrogatory No. 40.

INTERROGATORY NO. 42:

Omitted as duplicative of Standing Order #1 Interrogatories

ANSWER:

INTERROGATORY NO. 43:

Prior to the date on which defendant and/or any predecessor/related entity was first named as a party to any