

1 REQUEST FOR ADMISSION NN: You were aware as early as 1975
2 of research, studies and/or articles indicating a causal connection
3 between asbestos exposure and

4 (a) asbestosis;

5 (b) lung cancer;

6 (c) mesothelioma;

7 (d) forms of cancer other than lung cancer.

8 RESPONSE: Admitted as to (a) and (c). We are unclear as to what you are
9 referencing in (b) and (d) and therefore deny the same.

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12 4.19 Have you ever lobbied for or participated in the
13 lobbying for, or in the creation of, governmental/legislative
14 remedies for asbestos-related lung diseases?

15 ANSWER: No.

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20 4.20 If your answer to the preceding interrogatory is in
21 the affirmative, state in detail:

22 (a) The form such lobbying took;

23 (b) All person(s) acting on behalf of defendant;
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