

1 INTERROGATORY NO. 73:

2 Please state whether or not defendant ever maintained
3 a library or collection of medical information pertaining to
effects of asbestos upon human health. If so please state:

4 (a) The location of said library or collection,

5 (b) The person(s) who maintained it;

6 (c) The bibliography of medical articles, materials,
7 and other reports that are or were a part of said library on
said subject, including journals, publications, reports and all
8 memoranda published and received by defendant since 1930.

9 RESPONSE TO INTERROGATORY NO. 73:

10 Wagner has not maintained a library specifically re-
11 lating to the effects of asbestos on human health. Articles and
12 other publications on this subject are among the materials main-
13 tained by Wagner's labor relations department relating to em-
14 ployee health and safety.

15 INTERROGATORY NO. 74:

16 Please state whether or not any governmental agency
17 has ever written letters of warning to defendant pertaining to
the likelihood of injury to persons being exposed to asbestos
and asbestos-containing products.

18 RESPONSE TO INTERROGATORY NO. 74:

19 No.

20 INTERROGATORY NO. 75:

21 If the answer to the preceding Interrogatory is affir-
22 mative, please state the name and address of the agency, the
date of the letters of warning and who possesses a copy of said
23 documents.

24 RESPONSE TO INTERROGATORY NO. 75:

25 See Wagner's response to Interrogatory No. 74.

26 INTERROGATORY NO. 76:

27 Please state the date defendant received information
pertaining to the association between inhalation of asbestos
28 fibers and the development of cancer and asbestosis. Include in
your answer to the preceding the source of said information.