B48. Has defendant and/or its agents or employees obtained any statements from anyone who has knowledge of the facts surrounding this cause of action? If so, set forth:

ANSWER: None to date.

(a) The name, address and job position of the person that obtained the statement;

(b) The name, address and job position of the person who gave the statement;

(c) The date the statement was given;

(d) Whether the statement is in writing, and if so, who has custody of it.

B49. Does defendant contend that plaintiff or plaintiff's decedent suffered injuries and/or death due to his own negligence? If so, set forth all facts which support your contentions.

ANSWER: Yes. The plaintiffs smoking.

B50. Does defendant contend that plaintiff or plaintiff's decedent failed to use defendant's asbestos or asbestos containing products properly? If so, set forth all facts which support your contentions.

ANSWER: No such contention in this case to our knowledge at this time.