

1 INTERROGATORY NO. 33:

2 Please state if the defendant ever conducted, sponsored or
3 contributed financially to any research or studies to determine
4 if the inhalation of asbestos fibers may be harmful. If so,
5 please state:

6 (a) By whom the research was conducted;

7 (b) The dates the research study was conducted;

8 (c) The results of the research or study.

9 RESPONSE:

10 OBJECTION. Interrogatory No. 33 is objected to on the
11 grounds that it is overly broad, vague and ambiguous. Without
12 waiving said objection, and in the spirit of liberal discovery,
13 defendant responds that it appears that in or about 1936, Ameri-
14 can Brake Shoe and Foundry Company agreed to contribute monies to
15 a study to be conducted by Dr. LeRoy Gardner at Saranac Labora-
16 tory, Saranac Lake, New York, and in 1973, American Brake Shoe
17 and Foundry Company apparently committed \$250 per annum for three
18 years by way of contribution.

19 INTERROGATORY NO. 34:

20 Please state the names, addresses, dates of employment and
21 official title of the defendant's chief medical officers from
22 1930 until the present.

23 RESPONSE:

24 (1) 1941 to 1961: Lloyd E. Hamlin, M.D. (Deceased);

25 (2) 1961 to 1976: Charles C. Blackwell, Jr., M.D., 4911
26 East Doubletree Ranch Road, Paradise Valley, Arizona 85253;

27 (3) 1976 to 1982: Frederick W. Knoch, M.D. (Deceased);

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