REQUEST FOR ADMISSION JJ: You were aware as early as 1940 of research, studies and/or articles indicating a causal connection between asbestos exposure and

(a) asbestosis;

(b) lung cancer;

(c) mesothelioma;

(d) forms of cancer other than lung cancer.

RESPONSE: Denied.

REQUEST FOR ADMISSION KK: You were aware as early as 1950 of research, studies and/or articles indicating a causal connection between asbestos exposure and

(a) asbestosis;

(b) lung cancer;

(c) mesothelioma;

(d) forms of cancer other than lung cancer.

RESPONSE: Denied.