

ANSWER:

*See Answer to Interrogatory No. 21, which is incorporated herein as if fully rewritten.*

INTERROGATORY NO. 131:

From [1930 to 1980], state whether Defendant and/or any predecessor or related company ever provided Workers' Compensation, health, accident and disability and/or life insurance coverage for its employees, and if so:

- (a) Identify each insurance carrier which provided workers' compensation, health, accident and disability and/or life insurance coverage to your employees and the dates such coverage was provided by each such carrier;
- (b) State whether such insurance carrier(s) ever conducted any dust counts or studies, industrial hygiene surveys or other tests relating to any asbestos-containing products that Defendant's employees may have been working with or around; and,
- (c) If your response to subpart (b) hereof is in the affirmative, please indicate the date of each such count, study, survey or other test and identify all documents relating thereto.

ANSWER:

Defendant currently is aware that Worker's Compensation and other insurance coverage was available to employees for all or part of the relevant time period from 1930 to 1980. Defendant currently is aware that insurance carrier dust counts or studies and industrial hygiene surveys were done. *See also Answer to Interrogatory No. 56, which is incorporated herein as if fully rewritten.*