

- (a) State the dates such library existed;
- (b) Identify the person(s) within the corporate structure to whom library employees reported throughout the existence of the library; and,
- (c) State the present location of any and all books, documents, and/or materials that were at any time part of said library.

ANSWER: - Gleason objects to this Interrogatory as overly broad, burdensome, harassing, excessive in scope and time and incorrectly implying that its products were a health hazard.

INTERROGATORY NO. 32:

Omitted as duplicative of Standing Order #1
Interrogatories

ANSWER:

INTERROGATORY NO. 33:

Omitted as duplicative of Standing Order #1
Interrogatories

ANSWER:

INTERROGATORY NO. 34:

State the year that Defendant and/or any predecessor/related entity was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust, promulgated by the American Conference of Governmental Industrial Hygienists, and identify the specific person(s) receiving such advise, and any and all documents communicating such advise. State whether such threshold limit values or maximum allowable concentrations referred involved TOTAL dust or just asbestos