

INTERROGATORY NO. 98:

Identify any and all documents which Defendant, its predecessor(s) or any related company [between 1930 and 1980] submitted to, or received from, the organizations listed in response to Interrogatory Nos. 94 and/or 97:

- (a) which refer to, relate to or reflect the subject of asbestos;
- (b) which refer to, relate to or reflect a relationship between asbestos exposure and any disease; and/or
- (c) which refer to, relate to or reflect the placement or providing of warnings with respect to hazardous products.

ANSWER:

See Answers to Interrogatory Nos. 43, 96 and 99, which are incorporated herein as if fully rewritten.

INTERROGATORY NO. 99:

Identify any and all documents including, but not limited to, minutes, bulletins or reports, [that were, between 1930 and 1980,] created by, or on behalf of, any trade organization, association or entity listed in response to Interrogatory No. 94 and/or 97 or any committee, subcommittee or subgroup thereof;

- (a) which refer to, relate to or reflect the subject of asbestos;
- (b) which refer to, relate to or reflect a relationship between asbestos exposure and any disease; or
- (c) which refer to, relate to or reflect the placement or providing of warnings with respect to hazardous products.

ANSWER: