

1 INTERROGATORY NO. 41:

2 Please state the names of all organizations, groups,
3 inter-company or industrial organizations that defendant has
4 been a member of which conducted studies or research on the
relationship between exposure to asbestos or asbestos-containing
products and asbestosis and lung cancer from 1930 to 1972.

5 RESPONSE TO INTERROGATORY NO. 41:

6 Wagner currently lacks knowledge of whether any orgai-
7 zation to which it belongs conducted such studies. Wagner's
8 investigation continues.

9 INTERROGATORY NO. 42:

10 Please state the name, address and amount spent or
11 contributed by the defendant annually from 1930 until 1972 for
12 research specifically directed to the relationship between expo-
sure to asbestos-containing products and asbestosis, lung cancer
or any other pulmonary disease.

13 RESPONSE TO INTERROGATORY NO. 42:

14 Wagner currently lacks knowledge of whether any orga-
15 nization to which it belongs conducted such studies. Wagner's
16 investigation continues.

17 INTERROGATORY NO. 43:

18 Please state the name, address and amount annually
19 cotributed by the defendant from 1930 to 1972 to any independent
20 medical research group or groups studying the relationship be-
tween exposure to asbestos and pulmonary disease.

21 RESPONSE TO INTERROGATORY NO. 43:

22 Wagner currently lacks knowledge of whether any organization to
23 which it belongs conducted such studies. Wagner's investigation
continues.

24 INTERROGATORY NO. 44:

25 Please state whether the defendant had a department,
26 division or section devoted to scientific and/or medical re-
27 search during the period from 1930 until the present time.