

Hampshire's Answers to Interrogatories Baltimore County
11/1/88

or procedure and what action, if any, was taken by you in response to the findings made as a result of said practice or procedure.

ANSWER TO INTERROGATORY NO. 37:

No. Prior to the early 1970's, this Defendant reasonably relied upon the superior knowledge and on the information supplied to it by said manufacturers and/or suppliers of its manufacturers and/or suppliers of the material it purchased.

INTERROGATORY NO. 38:

State whether you ever conducted or directed any studies designed to learn how to minimize or eliminate the inhalation and ingestion of asbestos dust and fibers by those who use your asbestos products or are exposed to asbestos dust or fibers therefrom.

ANSWER TO INTERROGATORY NO. 38:

This Defendant was a user of products manufactured or mined by others, and relied upon the superior knowledge of its manufacturers and/or suppliers and on the information supplied to it by said manufacturers and/or suppliers of the material it purchased. This Defendant did not conduct any such studies.

INTERROGATORY NO. 39:

Identify all trade organizations, associations or other entities to which you belong or belonged. Said organizations, etcetera, include, at a minimum, the following:

Asbestos Textile Institute (ATI); Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF); Mineral Wool Institute; Industrial Mineral Insulation Manufacturers Institute, Magnesia Silica Insulation Manufacturers Association, National Insulation Manufacturers Association (NIMA); Thermal Insulation Manufacturers Association (TIMA); Asbestos Information Association (AIA); Quebec Asbestos Mining Association (QAMA); National Safety Council, Asbestos Cement Producers Association; Refractories Institute.

ANSWER TO INTERROGATORY NO. 39:

Defendant was or is presently a member of the Contractors, Plasterers, Lathers International Association, now known as The

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