

Hampshire's Answers to Master Interrogatories Answer 8/24/93

materials contained therein. If so, indicate the date of each test, the individual or group conducting each such test, the result or conclusion of each such test, all documents which refer, relate or pertain to each such test, and the present custodian of all documents identified in this Answer.

ANSWER TO INTERROGATORY NO. 36:

Not applicable. See the Answer to Interrogatory No. 8.

INTERROGATORY NO. 37:

State whether, prior to 1982, you ever had any labor inspectors or persons from or financed by your company go to job sites or other areas where your asbestos products were being used or installed to make a dust level count. If so, indicate when and where such a practice or procedure occurred, the purpose of the practice or procedure, the results of such dust counts and what action, if any, was taken by you in response to the findings made as a result of said practice or procedure. If not, explain why such dust counts were not done.

ANSWER TO INTERROGATORY NO. 37:

No.

INTERROGATORY NO. 38:

State whether you ever conducted or directed any studies designed to learn how to prevent, 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. If so, indicate the date of each study, the individual or group conducting each such study, the result or conclusion of each such study, all documents which refer, relate or pertain to each such study, and the present custodian of all documents identified in this Answer.

ANSWER TO INTERROGATORY NO. 38:

This Defendant was a user of materials manufactured or mined by others, and relied upon the superior knowledge of those manufacturers and/or suppliers, and on the information supplied to it by said manufacturers and/or suppliers, of the materials it

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