(b) Identify the person(s) and/or entity(ies) conducting said study;

(c) State the date said study began and the date on which it was completed;

(d) Identify any and all persons, including, but not limited to, directors, officers, agents or employees of Defendant, who participated in the decision to have said study conducted;

(e) Describe the nature of said study;

(f) Describe the nature of any action to eliminate or minimize inhalation of asbestos dust or asbestos fibers undertaken as a result of said study;

(g). Identify any and all documents referring to, relating to or reflecting said study or the results thereof; and,

(h). Identify any and all persons receiving a copy of any document referring to, relating to or reflecting the results or conclusions of said study.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 62:

See Objections and Answer to Interrogatory No. 61, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 63: Did Defendant, any related company, or any predecessor at any time, give to persons, who would be applying and/or removing any of the products listed in response to Interrogatory Nos. 19 and 42, any instructions or guidelines concerning precautions, warnings, procedures, and/or methods to use, in order to safely apply or remove such products? If so, describe such instructions, state to whom they were given, state the dates they were given, and describe the manner in which they were given.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 63:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory on the ground that it purports to shift the burden of establishing causation from plaintiffs to Abex.