

source of that information including a description of all tests conducted relative to possibility of such a relationship.

ANSWER: Abex objects to this interrogatory on the grounds that it fails to distinguish among the different types of raw asbestos fibers, asbestos in building products and asbestos in automotive friction products. To the extent this interrogatory seeks information concerning the working conditions of Abex employees, it is objected to on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, see answer to interrogatory No. 17.

21. Please identify all physicians, industrial hygienists, and other employees (including their names and addresses) who were employed, retained or otherwise engaged by Defendant for research, investigation or study concerning asbestos or asbestos-related diseases.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and assumes facts not established. To the extent this interrogatory seeks information concerning the working conditions of Abex employees, it is objected to on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, Abex never employed, retained or otherwise engaged anyone for "research, investigation or study concerning asbestos or asbestos-related diseases." Abex further states that it has employed industrial hygienists and medical directors whose job