

(d) Name, address and telephone number of the present or last known custodian of any copies of such magazine.

ANSWER TO INTERROGATORY NO. 85: See answer to interrogatory No. 84.

86. Does the answering defendant have in its possession any medical records, not previously produced in this case relating to any of the plaintiffs, including, but not limited to, charts, x-rays, physical examination reports, summaries, tape recordings of interviews and any and all other records pertaining to the medical condition of the plaintiffs? If so, plaintiffs request that such records be produced in accordance with Rule 34.

ANSWER TO INTERROGATORY NO. 86: Abex objects to this interrogatory on the grounds that it seeks information which has been gathered or prepared in the course of litigation or which is otherwise protected by the attorney-client privilege, the work product doctrine or any other applicable privilege.

87. With respect to each such contention contained in your response to the Complaint, state the following:

- (a) Identify which defense it relates to;
- (b) Each fact upon which your contention is based;
- (c) The names and present or last known addresses and present or last known employer of all persons having knowledge of any of the facts set out in answer to subparagraph (b) hereof;
- (d) The description or designation of each document which in any way reflects, relates or refers to any of the facts set out in answer to subparagraph (b) hereof.

ANSWER TO INTERROGATORY NO. 87: Abex objects to this interrogatory on the grounds that it is premature.

88. Other than annual reports pursuant to Interrogatory No. 73 above, identify documents which accurately