

ANSWER TO INTERROGATORY NO. 38: Abex objects to this interrogatory on the grounds that in seeking information concerning Abex employees, it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to producing any documents in response to this interrogatory on the grounds that such requests are outside permissible discovery rules. Subject to and without waiving these objections, Abex does not precisely know when it first became aware of threshold limit values for asbestos.

39. When did any official with Defendant first have knowledge, information or understanding that asbestos would or could or might produce the diseases of:

- (a) Asbestosis;
- (b) Mesothelioma;
- (c) Lung cancer;
- (d) Any other disease;
- (e) With reference to your company give the name of such official who first has such knowledge, information or understanding;
- (f) If there are any documents, records or memorandums (sic) of any kind concerning such knowledge, list them and attach copies.

ANSWER TO INTERROGATORY NO. 39: Abex objects to this interrogatory on the grounds that it fails to distinguish among the different types of raw asbestos, asbestos contained in building products and asbestos contained 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. Abex further objects to