

INTERROGATORY NO. 97: For each subpart of Interrogatory No. 96 to which your answer is "Yes," identify each and every person serving in such capacity and:

- (a) state the trade organization, association or entity for which such service was rendered;
- (b) specify the capacity of service, including identifying any specific committee, subcommittee or other trade organizations, associations or entities involved; and,
- (c) state the applicable dates of service.

ANSWER TO INTERROGATORY NO. 97:

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

Pursuant to the Court's April 13, 2000 Order, Abex's answer to this interrogatory is limited to the years between 1930 and 1980.

Abex also objects to this interrogatory on the grounds that the information or materials it purports to seek lack relevance to the issues arising in these cases and are not calculated to lead to the discovery of admissible evidence. To the extent it purports to seek information or materials regarding the working conditions of Abex employees, this interrogatory is further objected to on the grounds that such information or materials lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Abex objects to this interrogatory on the ground that it assumes the truth of matters not established or matters not in evidence.

Subject to and without waiving these objections, insofar as Abex understands this interrogatory, see Answer to Interrogatory Nos. 95 and 98.