

Hygienists? If so, state the date or dates that you so advised such contractors, the manner in which you advised such contractor and the name of each contractor.

ANSWER TO INTERROGATORY NO. 33: To the best of current knowledge and belief, no.

34. Did Defendant or any predecessor(s) ever have a division or subsidiary company engaged in the contracting business of applying insulation products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company and the dates such division or subsidiary company was engaged in the contracting business.

ANSWER TO INTERROGATORY NO. 34: No.

35. Did any division of Defendant engaged in the contract business of using asbestos products or your workmen's compensation insurance carrier ever have any claims for lung diseases or death from lung diseases, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or any exposure to asbestos products prior to 1972? If the answer is "Yes," give the name of such employees and attach copies of such claims and copies of all documents relating to the disposition and handling of such claims.

ANSWER TO INTERROGATORY NO. 35: Abex did not have any division engaged in the contract business of using asbestos products. Abex also 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. Abex also claims the attorney-client privilege, the work product doctrine, the investigative privilege and the party communication privilege.