

Abex further objects to this interrogatory in that it seeks to shift the burden of proof from plaintiff to defendants.

Without waiver of these objections, upon information and belief, Abex is not aware of any information or documents which would be responsive to this request.

INTERROGATORY NO. 131

From 1940 to present, state whether Defendant and/or predecessor or related company ever provided workers' compensation health, accident and disability and/or life insurance coverage for its employees, and if so:

- (a) Withdrawn by plaintiff or stricken by the Court;
- (b) State whether such insurance carrier(s) ever conducted any dust counts or studies, industrial hygiene surveys or other tests relating to any asbestos-containing products that Defendant's employees may have been working with or around; and,
- (c) If you response to subpart (b) hereof is in the affirmative, please indicate the date of each such count, study, survey or other test and identify all documents relating thereto.

RESPONSE TO INTERROGATORY NO. 131:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory to the extent this interrogatory seeks information regarding safety issues at Abex or Abex plants where asbestos-containing and non-asbestos-containing products were manufactured, on the grounds that this interrogatory is overly broad and irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence, in that any exposure under such conditions would differ in quality, type, duration, and degree