

INTERROGATORY NO. 49: Does Defendant have, or has Defendant, any predecessor or any related company ever had, a Research Department? If so

- (a) State when such department was established, and whether or not such department has operated continuously since being established;

- (b) State how much defendant, its predecessors and/or related company expended each year on research, and
- (c) State the percentage of said expenditure which was for research concerning the health affects or asbestos;
- (d) Identify the person(s) in charge of such department throughout its existence; and
- (e) Identify the person(s) in charge of any asbestos-related research conducted by such department throughout the years.

ANSWER TO INTERROGATORY NO. 49:

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

Abex also objects to this interrogatory on the grounds that the term “any related company” is vague and ambiguous and calls for speculation.

Abex further objects to this interrogatory to the extent it purports to seek information or materials regarding time periods and products that are not at issue in these cases, on the grounds that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. Abex objects to this interrogatory on the grounds that the information or materials it purports to seek otherwise lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence

Abex also objects to this interrogatory on the ground that it assumes the truth of