

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 is speculative inasmuch as it fails to distinguish among raw asbestos, asbestos contained in building insulation products and/or asbestos-containing automotive and/or railroad friction products, and/or among the different types of asbestos fibers. Because the asbestos fiber contained in Abex's asbestos-containing automotive and/or railroad friction products was chrysotile, the only type of asbestos Abex ever used for product production, which was resin-bonded and encapsulated, proper use of such products did not create or contribute to any adverse health effects.

Subject to and without waiving these objections, Abex is unaware of when it was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust. Lloyd Hamlin served as Abex's Medical Director from 1941 to 1961. Dr. Hamlin published an article in 1955, referring therein to maximum allowable concentrations for various substances. Dr. Hamlin is deceased and Abex has no way to determine when, if ever, he or any other Abex official first received information responsive to this interrogatory. Abex has made a reasonable and good faith effort to obtain the requested information, to the extent that it is not equally available to plaintiffs, by making a good faith search of locations where documents containing this information, if it exists, should be found, where appropriate, by inquiry to other natural persons or organizations.

Abex's lack of personal knowledge is due to the following: Abex discontinued the manufacture and sale of asbestos-containing railroad friction products in 1977 and asbestos-containing automotive friction products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex,