

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 from any exposure at issue in this action. In addition, this interrogatory is overly broad and irrelevant as the information sought is not in any way limited in time or to activities which transpired in Illinois or to the alleged exposure of the plaintiff to any product of Abex.

Abex further objects to this interrogatory on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent to which it requests information which is not within the personal knowledge, possession or control of Abex, its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of Abex.

Without waiver of these objections, Abex responds that it is aware that Gordon S. Siegel, M.D. Chief of the Occupational Medicine Section, Division of Occupational Health, Department of Health, Education and Welfare of the U.S. Public Health Service in Washington D.C. in 1965, prepared to embark of a 20 year study entitled, "Occupational Health Study of the Asbestos Products Industry in the United States." As part of the study, Abex voluntarily agreed that all its employees who worked or would be hired at the Winchester, Virginia facility were to be surveyed. Information currently available to Abex indicates that this study may have been terminated for reasons unknown to Abex by the Government before it was concluded.

INTERROGATORY NO. 123:

If your answer to Interrogatory No. 122 is "Yes," then with respect to each such inspection, test or survey:

- (a) Identify the governmental entity conducting the same;