intends to call at trial of this matter and reserves the right to supplement this answer once such a determination has been made.

INTERROGATORY NO. 62.:

Please identify documents which will be used at time of trial, (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

ANSWER: Abex objects to this interrogatory on the grounds that it is premature. Abex has not yet determined which exhibits it intends to call at trial of this matter and reserves the right to supplement this Answer once such a determination has been made.

INTERROGATORY NO. 63.:

Please state when you first received a copy of the Fleischer/Drinker Report published in 1945/1946.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Subject to and without waiving these objections Abex states; Abex does not know precisely when, if ever, its management became aware of the above-referred article. Abex further states that it never manufactured or sold pipe covering.