

duties have included ensuring a safe working environment for Abex employees.

22. As to each person who acted in a medical advisory capacity (as it relates in any way to asbestos) to Defendant, please list their name, the date individual acted in this capacity, and that person's current address and job title.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and, in seeking information concerning the working conditions of Abex employees, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the following persons have served as medical director:

Lloyd E. Hamlin	1941-1961
Charles C. Blackwell	1961-1976
Frederich W. Knoch	1976-1982
William F. Redman	1982
Dennis G. Egnatz	1982-1987

Abex is currently without a medical director.

23. Please state if any medical officer or industrial hygienist or medical consultant ever made at any time any recommendations and/or suggestions to Defendant pertaining to the risks or hazards to persons involved in the manufacture or use of asbestos products and, if so, please state when, by whom or to who such recommendations and/or suggestions were made and the substance of each recommendation.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and, in seeking information concerning the working conditions of Abex employees, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. To the best of current knowledge, no Abex medical director or industrial hygienist made any