

RESPONSE TO INTERROGATORY NO. 33.1:

See General Objections. Abex further objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague, ambiguous and speculative.

Abex further objects to this interrogatory on the ground that the terms "any job site," "air sampling," "dust counts," "tests," and "other activities," are undefined or insufficiently defined, and call for speculation.

Abex further objects to this interrogatory on the ground that it purports to shift the burden of establishing causation from plaintiffs to the defendant.

Abex further objects to this interrogatory to the extent to which it seeks information regarding time periods, products and work sites that are not at issue in this case on the ground that such information lacks relevance, and is not reasonably calculated to lead to the discovery of admissible evidence. To the extent to which it seeks information regarding the working conditions of Abex employees, this interrogatory is objected to on the ground that such information lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the ground that the information it seeks otherwise lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory to the extent this interrogatory seeks information regarding safety issues at Abex plants where asbestos-containing and non-asbestos-containing products were manufactured, on the grounds that this interrogatory is overly broad and irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory to the extent it purports to seek information regarding the working conditions of Abex employees and safety information at Abex plants on