

SECOND AMENDED ANSWER TO INTERROGATORY NO. 46:

See Objections and Answer to Interrogatory No. 43, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 47: Identify any and all persons employed by Defendant, its predecessor or related company at any time from 1940 to date as an industrial hygienist or similar position.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 47:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory to the extent it purports to seek information or materials regarding time periods and products that are not at issue in these cases, on the grounds that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the grounds that the information or materials it purports to seek lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, Abex employed industrial hygienists and medical directors whose job duties included ensuring a safe working environment for all Abex employees. Because these personnel dealt with the working conditions of Abex employees, further information or materials regarding them lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this additional objection, the following persons served as medical director of Abex Corporation: