

ANSWER: See Response to Interrogatory No. 36.

38. Please state if the defendant or anybody on behalf of the defendant, including any organization, group, inter-company or industrial organization to which defendant belonged, ever conducted or sponsored or contributed financially to any studies or research to determine if the inhalation of asbestos fibers may be harmful or to determine the relationship, if any, between exposure to asbestos fibers or products and asbestosis and lung cancer? If so, please state:

(a) By whom the research was conducted, giving complete names and addresses.

(b) The dates that each such test was conducted.

(c) The complete results of each test or study.

(d) The identity of reports of the research department pertaining to the use by the corporation of asbestos in their manufactured insulation products.

(e) The financial costs to you of such studies or research.

(f) The recommendation of the study or tests.

(g) The resulting implementation of the studies or tests by defendant.

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden
2. Overly Broad
3. Lack of Particularity

Without waiving these objections, Abex states that to the best of current knowledge, it has never sponsored or contributed to