
IN THE COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY
CIVIL SECTION: TRIAL DIVISION

RICHARD SANDS and	:	JULY TERM, 1985
PATRICIA SANDS, h/w	:	
	:	
vs.	:	NO. 3259
	:	
ABEX CORPORATION	:	<u>ASBESTOS CASE</u>

ABEX CORPORATION'S ANSWERS TO
PLAINTIFF'S INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO DEFENDANT - SET I

INTRODUCTION AND GENERAL OBJECTIONS

Abex Corporation ("Abex"), by and through its attorneys of record, Clayton H. Thomas, Jr. & Associates, generally objects to these interrogatories on the grounds that they are unduly burdensome, oppressive, vague, overly broad as to time, scope and location, lack particularity, and are repetitive. The use of the words "any," "all" and "each" is overly broad and is objected to. Many of the interrogatories in this set designate extensive periods of time or request information without any limitation or specification of particular periods of time. As a result of the failure by plaintiff to specify relevant time periods, many of the interrogatories fail to distinguish relevant from irrelevant matter.

Many of these interrogatories call for Abex to characterize the state of knowledge or awareness of a corporation at any given time with regard to a particular fact, event or subject. Abex can only respond to such interrogatories, if at