

If yes, please state the names, addresses, home telephone numbers, places of employment, relationship to you, the present whereabouts of all such persons, and which of said persons you intend to produce as witnesses in the trial of this action.

ANSWER TO INTERROGATORY NO. 80: Abex objects to this interrogatory on the grounds that it seeks information which has been gathered or prepared in the course of litigation or which is otherwise protected by the attorney-client privilege, the work product doctrine or any other applicable privilege.

81. Do you or your attorneys have any written statements which you have not previously produced in this suit from any persons having knowledge of facts relevant to the subject matter of this lawsuit, including witnesses to the accident, injury, illnesses, etc. in question? If yes, please state the names, addresses, home telephone numbers, places of employment, relationship to you and the present whereabouts of all such persons.

ANSWER TO INTERROGATORY NO. 81: Abex objects to this interrogatory on the grounds that it seeks information which has been gathered or prepared in the course of litigation or which is otherwise protected by the attorney-client privilege, the work product doctrine or any other applicable privilege.

82. State whether you were a member of the Asbestos Information Association (A.I.A.) or in any manner received information or participated in any of the association's activities.

ANSWER TO INTERROGATORY NO. 82: See answer to interrogatory No. 58.

83. If your answer to any part of Interrogatory No. 82 is in the affirmative, please state:

(a) The date, times and places of any A.I.A. meetings attended;