

similar sources pertaining to the hazardous potentials of asbestos and which of such articles were received by you.

ANSWER: Abex objects to this Interrogatory on the grounds that said Interrogatory is overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving such objection, however, Abex states that with respect to any sources concerning asbestos, see Exhibit A attached.

13. Please state if Defendant, or anyone on behalf of Defendant, including any organization, group, inter-company or industrial organization to which the Defendant belonged, conducted, sponsored, researched 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 asbestos and lung cancer. If so, please state:

a) The type or nature of the studies.

ANSWER: Abex objects to this Interrogatory on the grounds that said Interrogatory seeks irrelevant and immaterial information and is not reasonably calculated to lead to the discovery of admissible evidence. Further, Abex objects on the grounds that this Interrogatory seeks the production of documents through the use of interrogatories which violates the Federal Rules of Civil Procedure.

b) By whom the research or studies were conducted, give the complete names and addresses.

ANSWER: See Response to Interrogatory No. 13(a) above.