

ANSWER TO INTERROGATORY NO. 50: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

51. With respect to the period from 1950 through 1980, state the names, addresses and company title or position of each person who at any time during that period was in charge of the following activities with regard to each of the products identified in answer to Interrogatory 1 or 8:

- (a) Production;
- (b) Marketing;
- (c) Labeling;
- (d) Advertising;
- (e) Product evaluation;
- (f) Research and development;
- (g) Distribution.

ANSWER TO INTERROGATORY NO. 51: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. As phrased, this interrogatory is so hopelessly overbroad that is impossible for Abex to render a meaningful response.

52. Identify the living parties or persons who are the most knowledgeable about asbestos mined and products containing asbestos sold and/or distributed by you from 1936 to present. Identify all documents which relate to such sales and/or distribution.

ANSWER TO INTERROGATORY NO. 52: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. As phrased, this interrogatory is so hopelessly