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74. Describe in detail your policy with respect to the destruction of records pertaining to each of the products identified in answer to Interrogatory No. 1.

(a) Identify all documents pertaining to your policy, if any, regarding the destruction of such records;

(b) Identify the person or persons having custody of such policy documents;

(c) Identify the person or persons in charge of destroying records pertaining to each such product;

(d) Identify each document which refers, reflects or relates to any information provided in answer to this interrogatory;

(e) Describe what steps, if any, you have taken since the institution of this action or other actions involving asbestos to prevent the destruction of any documents relating to asbestos.

ANSWER TO INTERROGATORY NO. 74: 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. Subject to and without waiving these objections, there have been numerous record retention programs instituted by Abex, a diverse, highly decentralized corporation. It is impossible to give a meaningful response to the interrogatory as framed. If the interrogatory is narrowed to refer to specific categories or types of records, a meaningful response may be possible.

75. State the names of all individuals who aided in the preparation of these answers, and for each such person, state:

(a) Which interrogatories they helped prepare or the particular subject area for which they supplied information;