

ANSWER TO INTERROGATORY NO. 71: Abex objects to this interrogatory on the grounds that it is premature. Abex has not yet determined which witnesses it intends to call at trial of this matter and reserves the right to supplement this answer once such a determination has been made.

72. State:

- (a) Whether your corporation is insured;
- (b) If so, the limits of the coverage;
- (c) The name of the insurance company;
- (d) Whether this claim has been accepted or whether a letter of intent to deny coverage has been received.

ANSWER TO INTERROGATORY NO. 72: 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, Abex is currently in litigation with various carriers concerning the trigger, scope and amount of coverage, if any, available to Abex in asbestos personal injury actions.

73. In whose possession are your and your predecessors' annual reports from 1936 to the present. Produce such reports.

ANSWER TO INTERROGATORY NO. 73: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, Dexter Kenfield is a custodian of Abex's documents. To the extent the documents requested exist, they are on file and can be