

Abex further objects to this interrogatory on the ground that the terms "research," "asbestos" and "asbestos-related diseases" are undefined or insufficiently defined, and call for speculation.

Abex further objects to this interrogatory on the ground that it purports to shift the burden of establishing causation from plaintiffs to the defendant.

Abex further objects to this interrogatory on the ground that the information it seeks lacks relevance to the issues arising in this case, and is not calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the ground that it assumes the truth of matters not established or matters not in evidence.

Abex further objects to this interrogatory to the extent to which it purports to seek information that has been gathered, received or prepared in the course of the asbestos litigation, or which is otherwise subject to the attorney-client privilege, the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, Abex responds that it did not maintain an official medical library, although its medical department did have various books, articles, and journals relevant to industrial medicine. Any such books, articles, and journals, if they exist, are currently kept at Abex's document storage facility in Brooklyn, New York.

INTERROGATORY NO. 35:

Did Defendant in the 1920's or 1930's commission, or participate in the arrangements with Metropolitan Life Insurance Company for studies at the Trudeau Foundation at Saranac Lake, New York, concerning the effect of inhalation or ingestion of asbestos fibers upon human and/or animal bodies.