

RESPONSE TO INTERROGATORY NO. 35:

See General Objections. Abex further objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous and speculative.

Abex further objects to this interrogatory on the ground that the terms "commission," "participate," "arrangements," "studies," "inhalation," "ingestion" and "asbestos fibers" are undefined, 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 to the extent to which it seeks information regarding time periods and products that are not at issue in this case on the ground that such information lacks relevance, and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the ground that the information it seeks otherwise lacks relevance to the issues arising in this case, and is not reasonably 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.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, Abex is generally aware that it contributed monies for certain studies at the Saranac Laboratory, Saranac, New York. Abex documents reflect that any such studies performed by the Saranac Laboratory on behalf of Abex specifically pertained to siderosis and silicosis studies. Plaintiffs' counsel in a different case have produced in discovery unauthenticated photocopies of documents purporting to show that Abex agreed in the 1930's to pay \$250 per year for three years with respect to a single asbestos-related animal study at the