

INTERROGATORY NO. 25.:

As to the disease asbestosis, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant became aware of the existence of the disease.
- C. Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that asbestos was caused by inhalation of asbestos fibers.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and unduly burdensome. Abex further objects to this interrogatory on the grounds that it is overly broad and fails to distinguish among the different types of raw asbestos, asbestos contained in building products and asbestos contained in automotive friction products. Abex further objects to this interrogatory on the grounds that it calls for a medical or legal conclusion which Abex is not qualified to render. To the extent this interrogatory seeks information concerning the working conditions of Abex employees, it is objected to on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible