E. The names of all products removed from the market as a result of these tests.

ANSWER: See Answer to Interrogatory No. 8.

INTERROGATORY NO. 12:

Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No. 6 now exist? If so, state:

A. The name of each product.

B. A description of each document and how it relates to each product.

C. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Abex objects to this interrogatory on the grounds that it improperly calls for a medical or scientific opinion or conclusion which this defendant is not qualified to render. See Answer to Interrogatory No. 7.

INTERROGATORY NO. 13:

Did Defendant or any of its subsidiary companies make any design changes as a result of the tests discussed in your Answer to Interrogatories No. 8 or 11? If the answer is affirmative, state:

A. The names of the products changed or modified.