

32. Have you, at any time since 1939, maintained any office or department dealing with (even in part) medical research related to asbestos exposure? If so, state:

- a. the name of such department;
- b. the location of such department;
- c. the name, address and title of each person who has been in charge of the department.

ANSWER TO INTERROGATORY NO. 32: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, Abex has employed industrial hygienists and medical directors whose job duties have included ensuring a safe working environment for Abex employees. Because these personnel dealt with the working conditions of Abex employees, further information concerning them is not relevant to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

33. State for any physician, biological scientist industrial hygienist, occupational health specialist, industrial hygiene organization, or health organization ever employed by your firm as a consultant, employee or otherwise, whose duties related to asbestos or occupational diseases;

- a. name and address;
- b. the dates of employment;
- c. the duties and responsibilities;
- d. the location, identifying titles or codes, and custodians of all reports or memoranda written by each;
- e. the professional specialization;
- f. the reason for hiring; and
- g. the name and address of the person in your firm responsible for hiring such person.