

1926. Discovery is continuing and Abex reserves the right to supplement this answer should further information become available.

2. Did any person prior to 1970, file a claim against any Workers' Compensation carrier covering Defendant alleging that he or she contracted a disease as a result of exposure to asbestos? If so, please state the following:

- (a) A list of each such claim by claimant's name, date filed and jurisdiction involved;
- (b) A brief summary of the disposition of each such claim.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, and, in seeking information regarding Abex employees, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

3. Have any of the products listed in response to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories been altered in chemical composition since first being marketed? If so, please state the following:

- (a) The trade name of each such product;
- (b) The date each such product was altered;
- (c) The nature of the alteration;
- (d) The reason for the alteration.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects on the grounds that, in seeking information concerning products to which the plaintiff does not allege her decedent was exposed, this interrogatory lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, hundreds of different