

burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of these objections, Abex responds that it 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 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 Saranac Laboratory. Abex records do not confirm any such agreement, nor do Abex records reflect any such payment.

INTERROGATORY NO. 87:

If your answer to Interrogatory No. 86 is "Yes," with respect to each such study or test:

- (a) State the nature of the involvement (performed, directed it to be performed, financed, sponsored, received results, etc.);
- (b) State when, where and at what intervals said study was performed;
- (c) Identify any and all persons, firms or entities which performed said study;
- (d) Identify any all documents referring to, relating or reflecting or reflecting said study or the results thereof; and
- (e) State all means by which the results of said study were disseminated including, if applicable, publication; and identify any and all persons who received said results and any and all publications in which said results appeared.

RESPONSE TO INTERROGATORY NO. 87:

See Abex's response to Interrogatory No. 86, above.

INTERROGATORY NO. 88: