

ANSWER: Abex did not manufacture or sell "asbestos products."

Abex further objects on the grounds that plaintiffs, Lloyd Eugene Dunton and Virginia Dunton, and Deborah Claire Dennison, individually and as Personal Representative of the Heirs and Estate of Lyle Oreste Dennison, Deceased, do not allege exposure in the listed states. Accordingly, this interrogatory is irrelevant and not calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, Abex states that an Abex Sales Department, District Manager was located in Dallas, Texas from at least 1967-1977. See also Answer to Interrogatory No. 7.

INTERROGATORY NO. 18:

List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER: 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