

is burdensome, overly broad as to time and scope and not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of these objections, Abex responds that it was a member of the following trade associations at various times:

Asbestos Information Association/ Asbestos Information Association of North
North America (AIA/NA) (1975 to 1980)
The Brake Lining Manufacturing Association (from an unknown period to 1949)
Friction Materials Standards Institute (1949 to 1994)
The Air Hygiene Foundation of America (1946) (subsequently known as the
Industrial Hygiene Foundation)
The American Industrial Hygiene Association ("AIHA") (1937)
The Air Pollution Control Association
The Manufacturers Alliance for Productivity and Innovation (formerly the
Machinery and Allied Products Institute).

Abex is aware that some of its employees attended some meetings of the Industrial Hygiene Foundation ("IHF"), however, Abex has not found any information in its files evidencing a corporate membership in IHF.

INTERROGATORY NO. 95:

Identify any and all persons attending, on behalf of Defendant, any predecessor or any related company, any meetings, seminars or symposiums held by the trade organizations, associations, or other entities identified in response to Interrogatory No. 94.

RESPONSE TO INTERROGATORY NO. 95:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent to which it