

INTERROGATORY NO. 90:

To be redrafted and resubmitted to defendants pursuant to order of the Court.

INTERROGATORY NO. 91:

How many past or present employees of Defendant, its predecessors or related companies are known by you who claim to be suffering from, to have suffered from, or have suffered deaths caused by:

- (a) asbestosis?
- (b) lung cancer?
- (c) mesothelioma?

RESPONSE TO INTERROGATORY NO. 91:

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 to the extent this interrogatory seeks information regarding safety issues at Abex or Abex plants where asbestos-containing and non-asbestos-containing products were manufactured, on the grounds that this interrogatory is overly broad and irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence, in that any exposure under such conditions would differ in quality, type, duration, and degree from any exposure at issue in this action. In addition, this interrogatory is overly broad and irrelevant as the information sought is not in any way limited in time or to activities which transpired in Illinois or to the alleged exposure of the plaintiff to any product of Abex.