

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 requests information which is not within the personal knowledge, possession or control of Abex, its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of Abex.

Without waiver of these objections, Abex responds that it can provide plaintiff with a reasonable opportunity for inspection and copying of non-privileged documents which may be responsive to this interrogatory and to which objection is not made through Abex counsel at a mutually convenient time and at the Abex document storage facility where they are maintained.

See also Abex's response to Interrogatory No 8, above.

INTERROGATORY NO. 84:

As to any knowledge or information referred to in Interrogatories 79-83, did Defendant, at any time, educate or inform its employees, distributors, purchasers or any persons working in the vicinity where any asbestos-containing product was being applied or installed as to the hazards known to Defendant or about which Defendant had information, and as to the safety precautions necessary to guard against cancer and other diseases arising from the use and handling of the products identified in response to Interrogatory No. 19?

RESPONSE TO INTERROGATORY NO. 84:

See General Objections. 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