

36. Give the location of the state industrial accident board handling each such claim, the disposition of such claims, and the amounts paid in workmen's compensation benefits to each such employee, and the name of the compensation carrier.

ANSWER TO INTERROGATORY NO. 36: Abex objects to this interrogatory on the grounds that in seeking information concerning Abex employees, it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex also claims the attorney-client privilege, the work product doctrine, the investigative privilege and the party communication privilege.

37. Did you or your predecessor(s) ever make any industrial hygiene surveys? If so, give the date of such surveys, and attach copies of such surveys.

ANSWER TO INTERROGATORY NO. 37: Abex objects to this interrogatory on the grounds that in seeking information concerning Abex employees, it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to producing any documents in response to this interrogatory on the grounds that such requests are outside permissible discovery rules. Abex also claims the attorney-client privilege, the work product doctrine, the investigative privilege and the party communication privilege.

38. State the year that this Defendant or any predecessor(s) was first advised of either threshold limit value or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists, and state the name of the employee-official of the company receiving such advice and attach copies of the instrument communicating such advice.