

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. 55:

If your answer to Interrogatory No. 54 "Yes," with respect to each such survey:

- (1) Identify the product(s) which was used in the survey;
- (2) Identify any and all person(s), firm(s) or entity(ies) conducting or participating in the conducting of said survey;
- (3) State the date(s) of said survey;
- (4) Describe the methodology, results and conclusions of said survey;
- (5) Identify any and all documents referring to, relating to, or reflecting said survey or the results and conclusions thereof; and,
- (6) Identify any and all persons to whom such document may have been sent.

RESPONSE TO INTERROGATORY NO. 55:

Not applicable. See Abex's response to Interrogatory No. 54; above.

INTERROGATORY NO. 56:

Has Defendant, any predecessor or any related company, or any person or entity acting on behalf thereof, including but not limited to any insurance company, at any time, gone into any area where any product identified in response to Interrogatory Nos. 19 and 42 was being manufactured, used, applied or installed to perform a dust level count or similar test?