

36. Did you in any way assist, participate, or contribute any studies of asbestos conducted by the Trudeau Foundation Saranac Laboratory from 1939 to 1980. If so:

a. state your involvement;

b. identify all documents relevant to such activities by name, date, title, file number and present location.

ANSWER TO INTERROGATORY NO. 36: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and seeks information which has been gathered or prepared in the course of litigation or which is otherwise protected by the attorney-client privilege, the work product doctrine or any other applicable privilege. To the extent this interrogatory seeks information concerning the working conditions of Abex employees, it is objected to on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, ~~Abex~~ is generally aware that it contributed monies for certain studies at the Saranac Laboratory, Saranac, New York. Abex documents reflect that any such studies performed by the Saranac Laboratory on behalf of Abex specifically pertained to siderosis and silicosis studies. Plaintiffs' counsel have produced in discovery unauthenticated photocopies of documents attempting to suggest that Abex agreed in the 1930's to pay \$250 per year for three years with respect to a single asbestos-related study at the Saranac Laboratory. Abex records do not confirm any such agreement, nor do Abex records reflect any such payment.