

ANSWER TO INTERROGATORY NO. 38: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and, in seeking information concerning the working conditions of Abex employees, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

39. Pursuant to your record retention policy, have you destroyed any documents, records or writings pertaining to:

- a. health, hazards of asbestos;
- b. worker's compensation claims arising out of asbestosis, lung cancer, mesothelioma, corpulmonal, pneumoconiosis, or pulmonary fibrosis;
- c. placing warning labels on your products;
- d. dust-related hazardous conditions in your plants or factories;
- e. funding of studies about health hazards of asbestos;
- f. lawsuits arising out of injuries alleged to have been caused by asbestos;
- g. sales of asbestos products; and
- h. purchases of raw asbestos.

ANSWER TO INTERROGATORY NO. 39: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, 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, there have been numerous record retention programs instituted by Abex, a diverse, highly decentralized corporation. It is impossible to give a meaningful response to the interrogatory as framed. If the interrogatory is narrowed to refer to specific categories or