

45. Please state the names of trade association periodicals to which the defendant subscribed from 1928 to the present date. State whether or not the defendant had any knowledge of any articles being printed in industry trade journals, essays, memoranda and other similar sources pertaining to the hazardous potential of asbestos and which of such articles were received by you.

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden
2. Overly Broad
3. Lack of Particularity

Without waiving these objections, Abex states that it does not know with certainty each such periodical which may have been received by it. Such documents that do exist are on file and can be made available for inspection and copying upon receipt of an appropriate document request.

46. Please state organizations, groups, inter-company or industrial organizations to which the defendant belongs which conducted studies or researched the relationship, if any, between exposure to asbestos fibers or products and asbestosis and cancer from 1930 to 1982.

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden
2. Overly Broad
3. Lack of Particularity