INTERROGATORY NO. 23:

Does defendant have policies of insurance that cover the claims that have been made by plaintiff herein?

RESPONSE:

OBJECTION. Interrogatory No. 23 is objected to on the grounds that this defendant does not know to whom the term "plaintiff herein" applies, inasmuch as these interrogatories have been sent under the case caption of Lawrence Kane v. Johns-Manville, etc., et al., "And All Related Cases." Without waiving said objection, and in the spirit of liberal discovery, defendant refers the plaintiff to Exhibit "I" attached to these responses to Interrogatories for a listing of all applicable insurance carriers and corresponding coverage limits.

INTERROGATORY NO. 24:

If response to Interrogatory No. 23 is affirmative, please list the name of each insurance carrier referred to in the preceding interrogatory, the amount of such coverage, and the effective dates of each policy?

RESPONSE:

Please refer to response to Interrogatory No. 23.

INTERROGATORY NO. 25:

Is there any dispute as to insurance coverage with respect to claims made by plaintiff?

RESPONSE:

Please see objection to Interrogatory Nos. 23 and 24, supra. Without waiving said objection, and in the spirit of liberal discovery, defendant responds that Abex Corporation is litigating coverage issues with its insurance carriers, Maryland Casualty

LAW OFFICES
LSINGER & COSTANZO
OFESSIONAL CORPORATION
SEVENTH FLOOR
S WILSHIRE BOULEVARD
ANGELES CA 90010 (.6)
MAILING ADDRESS
P O BOX 60858
TERMINAL ANNEX
S ANGELES, CA 90060
(213) 388-9441