

INTERROGATORY NO. 48:

Identify any and all persons or entities, other than the employees listed above, which provided industrial hygienic or similar services or information to, or for the benefit of, this Defendant, at any time from 1940 to date, including, but not limited to, employees of, or anyone retained by, any predecessor or related company.

RESPONSE TO INTERROGATORY NO. 48:

See General Objections. Abex further objects to this request on the grounds that the phrase "similar services" is undefined rendering this request vague and ambiguous.

Without waiver of these objections, see Abex's response to Interrogatory No. 47, above.

INTERROGATORY NO. 49:

Does Defendant have, or has Defendant, any predecessor or any related company ever had, a Research Department? If so:

- (1) State when such department was established, and whether or not such department has operated continuously since being established;
- (2) State how much Defendant, its predecessors and/or related company expended each year on research; and
- (3) State the percentage of said expenditure which was for research concerning the health affects or asbestos;
- (4) Identify the person(s) in charge of such department throughout its existence; and
- (5) Identify the person(s) in charge of any asbestos-related research conducted by such department throughout the years.

RESPONSE TO INTERROGATORY NO. 49:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.