prepare and serve a privilege log on plaintiff within sixty (60) days after the last date upon which the documents were inspected. Any dispute as to the propriety of any objection can thereafter be resolved by the Court.

INTERROGATORY NO. 85: If your answer to Interrogatory No. 84 is "Yes," identify each such occasion on which Defendant so educated or informed its employees, distributors or purchasers, as follows:

(a) Identify the persons or parties which you educated or informed;

(b) State when, where and in what manner they were educated or informed;

(c) Identify any and all documents referring to, relating to or reflecting the communication or other dissemination of such information; and

(d) Identify any and all persons who so educated or informed said employees, distributors, purchasers or persons working in the vicinity of application or who participated in the same in any way including, but not limited to, assembling, drafting, writing, rewriting, preparing or conveying such information in any format.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 85:

See Objections and Answer to Interrogatory No. 84, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 86: Did Defendant or any predecessor entity perform, direct to be performed, finance in whole or in part, sponsor in whole or in part or receive the results of, any studies or tests concerning the relationship between asbestos exposure and asbestosis, cancer and/or mesothelioma?

SECOND AMENDED ANSWER TO INTERROGATORY NO. 86:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory on the ground that it purports to shift the burden of establishing causation from plaintiffs to Abex.