

Did Defendant at any time during the period that the products listed in response to Interrogatory Nos. 19 and 42 were manufactured, sold, applied or installed, inform any purchaser or user of said products that such products could cause cancer, asbestosis, and/or other serious diseases?

RESPONSE TO INTERROGATORY NO. 88:

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.

Abex further objects to this interrogatory to the extent this interrogatory seeks information regarding safety issues at Abex or Abex plants where asbestos-containing and non-asbestos-containing products were manufactured, on the grounds that this interrogatory is overly broad and irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence, in that any exposure under such conditions would differ in quality, type, duration, and degree from any exposure at issue in this action. In addition, this interrogatory is overly broad and irrelevant as the information sought is not in any way limited in time or to activities which transpired in Illinois or to the alleged exposure of the plaintiff to any product of Abex.

Without waiver of these objections, see Abex's response to Interrogatory No. 63, above.

INTERROGATORY NO. 89:

Did Defendant, any predecessor or any related company, or any workers' compensation insurance carrier thereof, ever have any claims for lung diseases or death from lung disease, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or exposure to asbestos-containing products?

RESPONSE TO INTERROGATORY NO. 89:

See General Objections. Abex further objects to this request on the grounds that it is