INTERROGATORY NO. 77: Describe, in detail, any and all tests, if any, conducted by Defendant, any predecessor or any related company, or anyone acting on behalf thereof, concerning the quantity, quality or threshold limit values of asbestos dust or particles to which applicators or consumers of asbestos-containing products were exposed while using any product identified in response to Interrogatory Nos 19 and 42, including.

(a) The product being used;

(b) Identify any and all person(s), firms) or entity(ies) conducting or participating in the conducting of said test;

(c) State the dates) of said test:

(d) Describe the methodology, results and conclusions of said test;

(e) Identify any and all documents referring to, relating or reflecting said test or the results and conclusions thereof; and,

(f) Identify any and all persons to whom any document referring to, relating to or reflecting the results or conclusions of said test was sent.

ANSWER TO INTERROGATORY NO. 77:

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

Abex also objects to this interrogatory on the grounds that the term "any related company" is vague and ambiguous and calls for speculation.

Abex further objects to this interrogatory on the grounds that the information or materials it purports to seek lack relevance to the issues arising in these cases and are not calculated to lead to the discovery of admissible evidence To the extent it purports to seek information or materials regarding the working conditions of Abex employees, this interrogatory is objected to on the grounds that such information or materials lack relevance to the issues