

Without waiving these objections, Abex states that it is without sufficient knowledge and information as to the specific research activities of each of the trade organizations of which Abex was a member.

47. In reference to Interrogatory 46, please state:

- (a) The type or nature of the studies.
- (b) When the studies were conducted.
- (c) The complete results of the studies.
- (d) The recommendations of the studies.
- (e) The resulting implementation of the studies by defendant.
- (f) The date when first implemented.

ANSWER: See Response to Interrogatory No. 46.

48. Please state the amounts and dates spent or contributed by the defendant annually from 1936 until the present time for research specifically directed to the relationship, if any, between a motor vehicle mechanic's exposure to asbestos containing insulation products and asbestosis, lung cancer or any other pulmonary disease.

ANSWER: Abex objects to this Interrogatory on the following grounds:

- 1. Burden
- 2. Overly Broad

Without waiving these objections, Abex states that it never conducted any studies in this regard. Any such studies in this regard, if any, which may have been performed by the various