

2. Overly Broad

3. Lack of Particularity

Without waiving these objections, Abex states that it is without sufficient knowledge as to when it first became aware of any threshold limit values for asbestos. Furthermore, as Abex did not have control over others' jobsites where its products were used, no testing in this regard would have been performed.

78. Are you aware of articles authored by W. C. Dresden, in Public Health Bulletin No. 241 of 1938, establishing threshold limit values for airborne asbestos fibers? If so, when did you become aware?

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

1. Burden

2. Overly Broad

Without waiving these objections, Abex states that it is not aware of said articles.

79. Please state whether or not you ever obtained any knowledge concerning the likelihood of asbestos inhalation being hazardous to health, and if so, state when you first become aware of the hazardous potential of asbestos and asbestos containing products. State how the defendant first obtained this knowledge and became so aware of said hazards and from what source this information was obtained.

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

1. Burden