

contract unit, by date, or in any other way that the defendant as a practical matter in the ordinary course of defendant's business actually breaks down and indexes the claims of the kind specified for purposes of defendant's own internal filing and record keeping.

(h) The state or federal agency or agencies which would in the ordinary course of defendant's business and in the ordinary course of the state and federal government's business receive notice of the claims;

(i) The indexing or filing system used by those agencies in the respective states or in the respective federal agencies.

(j) The records retention policies concerning claims of the kinds specified in Part (a) of the defendant, and of any state agencies of which the defendant has knowledge in states where the defendant does business, and to which the defendant supplies information concerning claims of this kind. Also include any federal agencies which would receive notice directly or in the defendant's knowledge indirectly as a matter of the ordinary business of the federal government concerning claims of the aforementioned kind;

(k) The disposition of said claim(s) including benefits paid or settlements reached or moneys voluntarily paid by your insurers, if any;

(l) The last known address of the attorney representing the Claimant, if any.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the grounds that the term "contracting units" is not defined and Abex cannot answer this interrogatory absent such definition.

37. Have you ever been named as a party in any action for workmen's compensation benefits for injury, occupational disease, or death by any of your employees or