

concerning these products could best be discovered from the companies that manufactured, sold or distributed the products.

INTERROGATORY NO. 47.3:

State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the manufacture or production of asbestos-containing products.

RESPONSE TO INTERROGATORY NO. 47.3:

See General Objections. Abex further objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, speculative and repetitive.

Objection is also made to this interrogatory on the ground that the terms "minimize," "eliminate," "risk," "occupational disease" and "pneumoconiosis" are undefined, and call for speculation.

Abex further objects to this interrogatory on the ground that it purports to shift the burden of establishing causation from plaintiffs to the defendant.

Abex further objects to this interrogatory on the ground that it seeks information regarding the working conditions of Abex employees which information lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the ground that the information it seeks otherwise lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 47.4:

State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the use, as distinguished from the manufacture, or exposed to the use of asbestos-containing or industrial insulation products or who were otherwise exposed to asbestos-containing or industrial insulation products.

- (a) describe such action;