

- (a) Identify the meetings and dates,
- (b) Who attended from your company;
- (c) What materials were dispensed.

ANSWER: Abex does not believe that any of its employees ever attended meetings of The Asbestos Textile Institute or its committees.

51. Identify all individuals who are now or have ever been employed by you including their current address who can testify or have testified concerning:

- (a) The history of that portion of your organization responsible for preventive medicine or occupational hygiene;
- (b) Your company medical policy, practices, and procedures;
- (c) The history of that portion of your organization responsible for product safety,
- (d) The nature and extent of your knowledge, over time, of health hazards actually, allegedly, or possibly associated with exposure to asbestos or asbestos products;
- (e) Actions taken by you to warn, direct or indirect purchasers of asbestos products or protect their employees of health hazards;
- (f) Actions taken to warn or protect persons such as plaintiff and spouse against hazards of asbestos.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, vague and ambiguous, and premature. Abex further objects on the grounds that this interrogatory lacks particularity as to what information is being requested. There may be many persons who