

reasonably calculated to lead to the discovery of admissible evidence. To the extent it purports to seek information or materials regarding the working conditions of Abex employees, this interrogatory is further objected to on the grounds that such information or materials lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, Abex states that it did not employ any "contract unit," engage in the practice of applying or installing asbestos-containing products, nor did Abex engage in the business of applying or installing asbestos-containing products.