

Not applicable.

INTERROGATORY NO. 47:

Identify any and all persons employed by Defendant, its predecessor or related company at any time from 1940 to date as an industrial hygienist or similar position.

RESPONSE TO INTERROGATORY NO. 47:

See General Objections. Abex further objects to this request on the grounds that the phrase "similar position" is undefined rendering this request vague and ambiguous.

Abex further objects to this request on the grounds that it overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of these objections, Abex responds that it employed a medical director to oversee the health and safety of its employees. The following persons served as medical director for the former Abex Corporation:

	Lloyd E. Hamlin	1941 - 1961	
	Charles C. Blackwell	1961 - 1976	Frederick W.
Knoch		1976 - 1982	
	William F. Redman	1982	
	Dennis G. Egnatz	1982 - 1987	

The primary function of Abex's medical director was to provide a safe working environment for all Abex employees. In addition, the staff of the Medical Department, including industrial hygienists and nurses, reported to the Medical Director. At the present time, defendant does not have a definitive list of all individuals who were employed as Industrial Hygienists. This information will be supplemented.

See also Abex's response to Interrogatory No 8, above.