

limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, Abex has employed industrial hygienists and medical directors who were to provide a safe working environment for all Abex employees. Because these personnel dealt with the working conditions of Abex employees, further information concerning them is not relevant to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the following persons have served as medical director:

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

INTERROGATORY NO. 19.:

Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

- A. The name of each such publication.
- B. The date of publication and the names of the author and publisher (if any).
- C. The date received by Defendant, if know.
- D. The name, job title and address of each person who currently has possession of each publication and its present location.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Abex objects to this