ANSWER: Abex objects to this interrogatory on the grounds that it is premature. Abex has not yet determined which exhibits it intends to call at trial of this matter and reserves the right to supplement this Answer once such a determination has been made.

INTERROGATORY NO. 63:

When, if ever, did Defendant or any of its predecessor-in-interest first receive a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels", published in January, 1946 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et. al. ("the Fleischer-Drinker Report")?

a. Identify the name and position of the employee or officer who received same;

b. please produce all documents generated by Defendant which discuss or in any way reference the "Fleischer Drinker" study prior to 1968;

c. please produce all documents upon which your Answers above are based;

d. please identify the name(s) and address(es) of any person(s) who can verify your above Answer;

e. did Defendant ever rely on the Fleischer-Drinker Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;

f. if so, please produce every document which evidences in any way that Defendant relied on the Fleischer-Drinker Report in whole or in part for the proposition stated in Interrogatory No. 63(a) above;