

(5)? Said definition is incorporated herein by reference, and defendant is required to reply as to all the parts of said definition. If so, state the facts, opinions or conclusions upon which defendant relies to support such contention, and identify each document which is applicable.

ANSWER: Abex objects to this interrogatory on the grounds it calls for a technical and scientific opinion which Abex is not qualified to render. Abex further objects to this interrogatory on the grounds that it seeks a legal conclusion which Abex is not qualified to render.

33. Have your asbestos products at any time been subjected to:

- (a) Tests or studies by a governmental agency;
- (b) Tests or studies by any independent organization;
- (c) Tests conducted on humans or animals on your behalf or on behalf of any co-defendant in this action. If your answer to any of the subsections (a) through (d) is in the affirmative, for each test or study state:

- (1) The date it began;
- (2) The date ended;
- (3) The procedure of the test or study;
- (4) The number of man hours spent on it;
- (5) The place where it was conducted.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, and vague and ambiguous in that "tests" is not defined and the interrogatory is not limited to asbestos dust or fibers allegedly released from