

2. Overly Broad

3. Improper Assumption

Without waiving these objections, Abex states that it does not know the exact date that it first became aware of the alleged potential health effects allegedly associated with asbestos.

80. Please state whether or not defendant ever maintained a library or collection of medical information pertaining to effect of asbestos upon human health, including its hazardous effects, and if so, where said library or collection was and is located, who the person was who maintained it, and what bibliography of medical articles, materials, and other reports were a part of said library on said subject, including journals, publications, reports and all memoranda published and received by you since 1930.

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden

2. Overly Broad

Without waiving these objections, Abex states that it has never established or maintained any libraries exclusively pertaining to the potential health effects allegedly associated with asbestos.

81.. Please state whether or not any governmental agency has ever written letters of warning to defendant pertaining to the likelihood of injury to persons being exposed to asbestos and asbestos containing products.

ANSWER: Abex objects to this Interrogatory on the following grounds: