

INTERROGATORY NO. 89: Did Defendant, any predecessor or any related company, or any workers' compensation insurance carrier thereof, ever have any claims for lung diseases or death from lung disease, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or exposure to asbestos-containing products?

ANSWER TO INTERROGATORY NO. 89:

Abex objects to this request on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this request on the grounds that the terms "any predecessor" and "related companies" are vague and ambiguous and call for speculation.

Abex also objects to this request on the grounds that it is premature, overly broad, oppressive, harassing and unduly burdensome in that, to date, plaintiffs have failed to proffer any evidence showing the requisite nexus between plaintiffs and/or plaintiffs' decedents and any Abex product.

Abex further objects to this request to the extent it purports to seek information or materials regarding time periods, products and medical conditions that are not at issue in these cases, on the grounds that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. To the extent it purports to seek information or materials regarding the working conditions of Abex employees, this request is objected to on the grounds that such information or materials lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence. Abex also objects to this request on the grounds that the information or materials it purports