

2. Lack of Relevance

Without waiving these objections, Abex states that upon current information and belief, Lloyd E. Hamlin, M.D. reported to the corporate Treasurer. Charles C. Blackwell, Jr., M.D., and Frederick W. Knoch, M.D., reported to the Vice President of Personnel Relations. Dennis G. Egnatz, M.D., reports to the Vice President of Human Resources.

41. Please state the duties and responsibilities of the corporation's chief medical officer and the nature and dates of changes in these duties and responsibilities.

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

1. Burden
2. Overly Broad
3. Lack of Particularity
4. Lack of Relevance

42. Please state the names and addresses and capacities of all physicians who were employed, retained or otherwise engaged by the defendant at any of its facilities from the years of 1930 until the present time.

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

1. Burden
2. Overly Broad
3. Lack of Relevance