

(g) The person(s) to whom the individual director reported;

(h) If no such individual was hired, please explain why.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

12. If any of your employees or officers have testified at trial or by deposition in any litigation or before any Congressional Committee or administrative agency, published any articles, or made any written statements concerning asbestos exposure, pulmonary or asbestos related diseases or industrial hygiene relating to asbestos use, state:

(a) The name, address and title of each person;

(b) The date, location, and forum of such statement, article or testimony;

(c) Whether defendant has a copy of such statement, article or testimony.

ANSWER: Abex objects to this interrogatory on the grounds it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

13. Have you undertaken to investigate the occurrence alleged in Plaintiff's complaint? If so, state:

(a) The name, address and title of the persons participating in such investigation;

(b) List each written record pertaining to such investigation and its location and custodian;