

(c) Whether you have obtained any written statements made by the plaintiff concerning any of the allegations in his complaint.

ANSWER: Abex objects to this interrogatory on the grounds that it seeks information which may have been gathered or prepared in the course of litigation or which is otherwise protected by the attorney-client privilege, the work product doctrine or by any other applicable privilege.

14. Do you contend that the detrimental effects of asbestos to human health differ between asbestos factory workers, miners, millers, insulation workers, and users of friction products? If so, explain in detail each such contention and supply the basis for each such contention.

ANSWER: Abex objects to this interrogatory on the grounds that it seeks a medical or scientific opinion which Abex is not qualified to render. Abex maintains that proper use of its asbestos-containing products does not present a health hazard.

15. Have you ever maintained an outside or independent unit which was responsible for installing, modifying, replacing, reconditioning or repairing asbestos friction products at locations outside of your own manufacturing plant? If so, please state:

- (a) When such units were created;
- (b) Where such units were employed or used;
- (c) Whether you maintained workers compensation insurance on these workers;
- (d) When, if ever, you received notice of an asbestos related disease among such workers;