

(e) Safety equipment and/or protective clothing to be utilized while handling defendant's asbestos products;

(f) Medical programs to be offered or sponsored by defendant.

RESPONSE TO INTERROGATORY NO. 101:

See General Objections. Abex further objects to this request on the grounds that the term "agreements" is so vague ambiguous and potentially misleading that Abex is unable to respond without a substantial risk of inaccuracy.

Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of these objections, upon information and belief, Abex is not aware of any information or documents responsive to this interrogatory.

INTERROGATORY NO. 102:

Did Defendant, any predecessor or related company, direct to be performed, sponsor in whole or in part, finance in whole or in part, receive the results of, or become aware of, any studies or tests performed by the Saranac Lake Laboratory of the Trudeau Foundation relating to asbestos exposure and its effects upon human health?

RESPONSE TO INTERROGATORY NO. 102:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of this objections, see Abex's response to Interrogatory No. 86, above.

INTERROGATORY NO. 103: