

to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the medical department of Abex may have certain publications mentioning the alleged potential health hazards of asbestos; however, it is not believed there was a library or collection of materials specifically relating to asbestos.

8. Have you, at any time since 1940, maintained any office or department dealing with medical or scientific research? If so, state:

- (a) The name of such department;
- (b) The location of such department;
- (c) The name, address, and title of each person who has been in charge of the department.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time, scope and locations, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the grounds that "dealing with medical or scientific research" is not defined and is therefore vague and ambiguous. Subject to and without waiving these objections, Abex has maintained a medical department since approximately 1941.

9. Has defendant hired a "medical director"? If so, state:

- (a) The reason for hiring such a medical