

SECOND AMENDED ANSWER TO INTERROGATORY NO. 59:

See Objections and Answer to Interrogatory No. 58, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 60: Did Defendant, its predecessor or related company, take any action as a result of any study or studies set forth in response to Interrogatory Nos. 56 and 58? If so, identify each and every study which resulted in some action being taken, and:

- (a) Describe the actions taken, including the effective date of said actions:
- (b) Identify any and all persons, including, but not limited to, directors, officers, agents and employees of Defendant who participated in the decision to undertake said actions; and
- (c) Identify any and all documents referring to, relating to or reflecting said actions, or any subsequent modification or discussion of the same.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 60:

See Objections and Answer to Interrogatory Nos. 56 and 58, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 61: Has Defendant, any predecessor, or any related company, or any person or entity acting on behalf thereof, at any time, conducted any study(ies) designed to minimize or eliminate the inhalation of asbestos dust and fibers by those using, handling or exposed to any product listed in response to Interrogatory Nos. 19 and 42?

SECOND AMENDED ANSWER TO INTERROGATORY NO. 61:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory on the ground that it purports to shift the burden of establishing causation from plaintiffs to Abex.

Abex further objects to this interrogatory to the extent it purports to seek information or materials regarding time periods and products that are not at issue in these cases, on the grounds