

INTERROGATORY NO. 43: With respect to the products listed in response to Interrogatories Nos 19 and 42, did Defendant, any predecessor or related company or the manufacturer of the products ever conduct test [sic] of any kind on any or all of said products concerning possible or potential health hazards involved in its use or in the use of material contained therein

ANSWER TO INTERROGATORY NO. 43:

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 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 that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. To the extent it purports to seek information or materials regarding the working conditions of Abex employees, this interrogatory is further objected to on the grounds that such information or materials lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence. Abex objects to this interrogatory on the grounds that the information or materials it purports to seek otherwise lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Abex also objects to this interrogatory on the ground that it assumes the truth of matters not established or matters not in evidence.

Abex further objects to this interrogatory on the ground that it seeks to impose upon Abex a legal duty or obligation to which it was not subject.

Abex objects to this interrogatory to the extent to which it purports to seek information or materials that have been gathered, received or prepared in the course of litigation,