

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?

ANSWER TO INTERROGATORY NO. 102:

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

Abex also objects to this interrogatory on the grounds that the terms "related company" is vague and ambiguous and calls for speculation.

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

Abex 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 ground that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. To the extent to which it purports to seek information or materials regarding the working conditions of Abex employees, this interrogatory is also 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 further 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 objects to this interrogatory on the grounds that it assumes the truth of matters not established or matters not in evidence.