

- (a) How long in existence;
- (b) Names of those who have led that department since 1930;
- (c) Any reports or warnings provided to you by that department as to the effects of asbestos;
- (d) Current address of that person or those persons referred to in (b) supra.

ANSWER TO INTERROGATORY NO. 43: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and, in seeking information concerning the working conditions of Abex employees, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

44. Have you had a medical advisor or other professional reviewing your products particularly asbestos, and making recommendations for use? If so, please answer (a)-(d) of interrogatory 43.

ANSWER TO INTERROGATORY NO. 44: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous and lacks particularity as to what information is being requested. Abex further objects on the grounds this interrogatory lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. To the extent this interrogatory seeks information which has been gathered or prepared in the course of litigation or which is otherwise protected by the attorney-client