

ANSWER: See Response to Interrogatory No. 22.

24. During the years 1935-1982 did you ever sell raw asbestos fiber or a friction product containing asbestos fibers to any of the co-defendants?

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden
2. Overly Broad
3. Lack of Particularity

Without waiving these objections, Abex states that it has never engaged in the sale of raw asbestos fiber. Invoices indicating sales of asbestos-containing friction materials are on file for most periods during the years 1976-present only, and can be made available for inspection and copying upon receipt of an appropriate document request. Such invoices are arranged numerically and chronologically by year, and not by customer, product or state.

25. If so, for each co-defendant, in what years and in what quantities did you make such sales?

ANSWER: See Response to Interrogatory No. 24.

26. Does defendant have policies of insurance that might cover the claims that have been made by plaintiff Richard C. Bell?