

materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Subject to and without waiving any of these objections, see objections and response to Interrogatory No. 5 Subpart (b)(2).

INTERROGATORY NO. 8.2:

For each company or business that Defendant knows may have marketed, distributed, installed, and/or sold those products listed in response to Interrogatory No. 5, please state the following as to each job site listed on Exhibit A.

- (a) The name and address of each such company;
- (b) The date of each sale from Defendant to such other company;
- (c) The name of the person at each other company with whom Defendant primarily dealt.
- (d) Names and quantities of the asbestos-containing products that you marketed, distributed, installed, and/or sold to each such company from 1950 to 1974.
- (e) Identify all documents relating to the sales to each such company.

RESPONSE INTERROGATORY NO. 8.2:

See General Objections. Abex further objects to this interrogatory on the grounds that it is over broad, oppressive, harassing, otherwise unduly burdensome, compound, vague and ambiguous.

Abex further objects to this interrogatory on the ground that the terms "marketed" and "distributed" are undefined or insufficiently defined, and call for speculation.

Abex further objects to this interrogatory on the grounds that the term "may have . . ." is over broad, oppressive, harassing, otherwise unduly burdensome and repetitive, and calls for speculation.

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