

RESPONSE TO INTERROGATORY NO. 10:

See General objections. Subject to and without waiving these objections, and insofar as Abex understands this interrogatory, upon information and belief, Abex responds: No.

INTERROGATORY NO. 11:

Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing refractory? If so, please give the name of each subdivision, the full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business.

RESPONSE TO INTERROGATORY NO. 11:

See General objections. Subject to and without waiving these objections, and insofar as Abex understands this interrogatory, upon information and belief, Abex responds: No.

INTERROGATORY NO. 12:

Please identify by location and product produced, each plant in which products listed in your answer to Interrogatory No. 5 have been manufactured and/or assembled and the dates said plants have been in operation.

RESPONSE TO INTERROGATORY NO. 12:

See General Objections. Abex further objects to this interrogatory on the grounds that it is overly broad and unduly burdensome.

Abex further objects to this interrogatory on the grounds that the term "product" is overly broad, vague, ambiguous, and speculative.

Abex further objects to this interrogatory to the extent to which it seeks information regarding time periods and products that are not at issue in this case on the ground that such information lacks relevance, and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the ground that the information it seeks otherwise lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence.