

ANSWER: See Answer to Interrogatory No. 7.

INTERROGATORY NO. 52.:

Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects to this interrogatory on the grounds that it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex objects to this interrogatory to the extent it seeks information on products which are not at issue in this case on the grounds that the information sought is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Abex also objects to this interrogatory to the extent that it seeks confidential, trade secret, or other proprietary information or materials. Subject to and without waiving these objections, Abex states, Yes. See also Answer to Interrogatory No. 7.

INTERROGATORY NO. 53.:

Did your company or its predecessor(s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

- A. All details of such recall;
- B. The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;