

objections are explicitly incorporated into each of the answers set forth herein.

SPECIFIC RESPONSES

1. Describe in detail, with specificity and particularity each product mined, produced, manufactured or sold by the answering defendant or its predecessors in title or subsidiaries which contained asbestos for each year from 1936 until 1980; and for each such product describe:

- (a) Its chemical ingredients;
- (b) State the manner in which it was intended to be used, i.e., in the construction and/or insulation of buildings and/or equipment, etc.;
- (c) For each ingredient contained herein state:
 - (i) The name or chemical composition of each substance, what harmful effects, if they are known, that it produces in man or mammals and whether it produces its harmful effects through ingestion, inhalation, absorption or a combination of these;
 - (ii) When you determined and/or learned that the substance produced harmful effects and how such effects were produced;
 - (iii) Identify each individual who participated in such determination and/or obtained such knowledge;
 - (iv) Identify each document that refers, reflects or relates to any information pertaining to the properties of each of the ingredients and/or how the harmful effects are produced as well as your determination of those toxic effects and the manner by which they are produced;
 - (v) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied;
 - (vi) Which products or ingredients were mined, which were manufactured and which were distributed by answering defendants.

ANSWER TO INTERROGATORY NO. 1: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections,