

INTERROGATORY NO. 8.3:

If you do not know any business that may have marketed, distributed, installed, and/or sold the products listed in response to Interrogatory No. 5 to any of the job sites listed on Exhibit A, please state the names and last known addresses of those companies who Defendant knows marketed, distributed, installed and/or sold their asbestos-containing products in Ohio from 1950 to 1974. For each of those companies, please state the following:

- (a) Name and address of each such company;
- (b) The dates 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) The names of the asbestos-containing products that Defendant marketed, distributed, and/or sold to each such company from 1950 to 1974.

RESPONSE TO INTERROGATORY NO. 8.3:

See General Objections. Abex further objects to this interrogatory on the grounds that it is overly broad, 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 ground that it purports to shift the burden of establishing product identification from plaintiffs to Abex.

Abex further objects to this interrogatory to the extent to which it seeks information regarding time periods, products and work sites 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.

Abex further objects to this interrogatory on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome to the extent to which it requests knowledge,