

RESPONSE TO INTERROGATORY NO. 6:

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

Objection is made to this interrogatory on the ground that it calls for a legal opinion or conclusion which Abex is unqualified to render.

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.

Abex further objects to this interrogatory on the ground that it purports to seek information that is a matter of public record and, thus, equally available to plaintiffs as Abex.

INTERROGATORY NO. 7:

Have any of the products listed above in answer to Interrogatory No. 5 been altered in chemical composition since first being marketed? If so, please state the following:

- (a) The trade name of each such product;
- (b) The date each such product was altered;
- (c) The nature of the alteration;
- (d) The reason for the alteration.

RESPONSE TO INTERROGATORY NO. 7:

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