

INTERROGATORY NO. 48.1:

Describe the method by which you have maintained records concerning the manufacture, sale, supply, distribution, use, advertising, delivery and/or installation or tear-out of each of asbestos-containing products. For each description provide the following:

- (a) each present and former company or corporate department, division or subdivision responsible for maintaining such records;
- (b) the manner in which the records are kept (e.g., boxes, computer tape, microfilm, etc.);
- (c) the inclusive dates of any such manufacturer, sale, supply, distribution, use, advertising, delivery, and/or installation or tear-out which such record keeping system covers;
- (d) the present location at which all such records are maintained;
- (e) the identity of each person employed by you at any time from 1930 to the present who is or was responsible for the collection and maintenance of such records.

RESPONSE TO INTERROGATORY NO. 48.1:

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 "supply," "distribution" and "use" are undefined or insufficiently defined, and call for speculation.

Abex further objects to this interrogatory on the ground that the information it seeks lacks relevance to the issues arising in this case, and is not calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, and insofar as Abex understands this interrogatory, there were numerous programs pertaining to records maintenance instituted by the former Abex Corporation, a diverse, highly decentralized corporation. It is impossible to give a meaningful response to the interrogatory as framed. If the interrogatory is narrowed to refer more clearly to specific categories or types of records, a meaningful response may be possible.