

New Hampshire. Abex Corporation has been continuously qualified to do business in the State of Texas since November 25, 1922.

INTERROGATORY NO. 3:

Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in the Dallas County asbestos litigation.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex objects to this interrogatory on the grounds that the term "material containing asbestos fibers" is undefined. Abex further objects to this interrogatory on the grounds that it is compound. Abex further objects to this interrogatory on the grounds that it fails to distinguish among the different types of raw asbestos fibers, asbestos-containing building products and asbestos-containing friction products. Subject to and without waiving these objections and to the extent Abex understands this question Abex states that Abex has never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987.

INTERROGATORY NO. 4:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.