

meeting the description of promotional and advertisement materials can be made available for inspection and copying. See also objections and response to Interrogatory No. 8, above.

INTERROGATORY NO. 43:

Has any written material of any kind or character been prepared by Defendant, Defendant's predecessor or any of Defendant's subsidiary companies or their agents indicating how the products listed in answer to Interrogatory No. 5 should be used or maintained by the ultimate user or those working in facilities or at job sites where the product was used, installed or removed, including, but not limited to, those sites listed on the job site list attached as Exhibit A? If so, please state the following:

- (a) The name, address and job classification of each person who prepared same;
- (b) The name, address and job classification of each person who presently has possession of same;
- (c) The dates and manner in which said material was distributed to purchasers of the products in answer to Interrogatory No. 5.

RESPONSE TO INTERROGATORY NO. 43:

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

Abex did not manufacture or sell "asbestos products." Objection is also made to this interrogatory on the grounds that the terms "used," "maintained," "ultimate user," "those working," "used," "installed" and "removed" are undefined, and call for speculation.

Abex further objects to this interrogatory on the ground that it purports to shift the burden of establishing causation from plaintiffs to the defendant.

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.