

INTERROGATORY NO. 47.2:

Has any person or company from which you purchased asbestos-containing products ever issued a recall of their products or taken any action to take those products off the market after said products were in your possession? If so, provide:

- (a) the date of said recall;
- (b) the name of the company which issued the recall;
- (c) a copy of the recall.

RESPONSE TO INTERROGATORY NO. 47.2:

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

Abex further objects to this interrogatory on the ground that the terms "asbestos containing products," "recall," "take" and "off the market" are undefined, and call for speculation.

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. To the extent to which it seeks information regarding the working conditions of Abex employees, this interrogatory is objected to on the ground that such information 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 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 request on the ground that it seeks information about entities other than Abex and this information should be obtained from such other entities. Information