

Objection is made to this interrogatory on the ground that the terms "altered," "chemical composition" and "alteration" 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. 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 grounds that it seeks or makes inquiry into confidential, proprietary or trade secret information or materials.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, Abex's asbestos-containing automotive friction products were not manufactured pursuant to any single formula. Any variations in the formulas of Abex's asbestos-containing automotive friction products were made to meet specifications, characteristics and uses established by the manufacturer of the vehicle or equipment on which the product would have been applied.

INTERROGATORY NO. 8:

Have any of the asbestos-containing products listed in response to Interrogatory No. 5 ever been marketed, distributed, packaged, labeled, and/or sold by any other company or business? If so, please state the following:

- (a) The name and address of each such company.
- (b) The names and address of Defendant's distributors in Ohio, West Virginia, Pennsylvania and Kentucky since 1940.
- (c) The date of each sale.
- (d) The name of the person at each location with whom you primarily dealt.