

4. Has your firm or any of its predecessors ever engaged in:

- a. the mining of asbestos material;
- b. the processing and/or refining of asbestos material;
- c. the manufacture of asbestos products;
- d. the sale and/or distribution of asbestos products.

ANSWER TO INTERROGATORY NO. 4:

- a. No.
- b. No.
- c,d. Abex objects to the term "asbestos products." Abex never manufactured, sold or distributed "asbestos products," but rather manufactured and sold automotive friction products, some of which contained chrysotile asbestos as one of their components.

5. Identify the distribution chain of Defendant's asbestos products since 1939 along with any documents evidencing or confirming such chain, including but not limited to distribution from and to other asbestos products manufacturers.

ANSWER TO INTERROGATORY NO. 5: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, documents which may be responsive to this request may be on file and if so, may be made available for inspection and copying upon receipt of an appropriate document request.