

Abex further objects to this interrogatory to the extent it purports to seek information or materials regarding time periods and products that are not at issue in these cases, on the grounds that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. Abex objects to this interrogatory on the grounds that the information or materials it purports to seek otherwise lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Abex also objects to this interrogatory on the ground that it assumes the truth of matters not established or matters not in evidence.

Subject to and without waiving these objections, and insofar as Abex understands this interrogatory:

ANSWER TO INTERROGATORY NO. 37 SUBPART (a):

Abex does not possess complete knowledge concerning its purchase of raw chrysotile asbestos fiber, the only asbestos fiber ever utilized by Abex in the manufacture of its asbestos-containing automotive and railroad friction products.

However, Abex is generally aware that, during various periods since 1948 and no later than 1987, when Abex ceased the manufacture of asbestos-containing automotive friction products, raw chrysotile asbestos fiber was purchased for use in manufacturing automotive and railroad friction products:

Asbestos Corporation, Ltd.
Thetford Mines
Quebec, Canada

Bell Asbestos Mines, Ltd.