

SUPREME COURT OF THE STATE OF NEW YORK
EIGHTH JUDICIAL DISTRICT

FILED
ACTIONS & PROCEEDINGS

MAY 15 2007

IN RE: EIGHTH JUDICIAL DISTRICT
ASBESTOS LITIGATION

: EJDAL MASTER FILE
: MASTER INDEX NO. H-95716

ELIOT COUNTY
CLERK'S OFFICE

This Document Applies to All Cases

: ANSWERS OF PNEUMO ABEX LLC,
: SUCCESSOR IN INTEREST TO
: ABEX CORPORATION, TO
: PLAINTIFFS' FIRST STANDARD
: SET OF LIABILITY INTERROGATORIES

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

Defendant Pneumo Abex LLC, successor in interest to Abex Corporation (hereinafter "Abex"), by and through its attorneys of record, Smith Abbot, L.L.P., hereby responds to these interrogatories, as follows:

1. Abex objects to these interrogatories on the grounds that they are overly broad, unduly burdensome, compound, vague and ambiguous and call for speculation.
2. Abex also objects to these interrogatories on the grounds that they are premature, argumentative, oppressive, harassing, duplicative, repetitive and complex.
3. Abex further objects to these interrogatories on the ground that they purport to shift the burden of establishing product identification from plaintiffs to Abex.
4. Abex objects to these interrogatories on the ground that they purport to shift the burden of establishing causation from plaintiffs to Abex.
5. Abex also objects to these interrogatories on the grounds that they are compound, contain numerous terms that are vague and ambiguous and call for speculation.
6. Abex further objects to these interrogatories to the extent they purport to seek information or materials unrelated to Abex's alleged liability in these actions and are not

EXHIBIT

Hobbie 35
9-8-08 VR

SCF-EC-6025