inasmuch as it fails to distinguish among raw asbestos, asbestos contained in building insulation products and/or asbestos-containing automotive friction products, and/or among the different types of asbestos fibers. Because the asbestos fiber contained in Abex's asbestos-containing automotive friction products was chrysotile, the only type of asbestos Abex ever used for product production, which was resin-bonded and encapsulated, proper use of such products did not create or contribute to any adverse health effects.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, Abex never mined, marketed or commercially sold raw asbestos.

Abex's asbestos-containing automotive friction products were manufactured in Detroit, Michigan; Salisbury, North Carolina; and Winchester, Virginia. Abex does not have any specific knowledge or information as to whether any automotive friction products were manufactured at its former facility in Lancaster, New York. Said facility was destroyed in 1927. Abex is unaware of any documents that could indicate that asbestos-containing automotive friction products were manufactured at the Lancaster, New York facility prior to 1927.

Upon information and belief, E.H. Feirberand (Winchester), Albert Indelicato (Salisbury), and Charles Mallory (Winchester) may have had some operational responsibilities over these plants.

Abex's asbestos-containing railroad friction products were manufactured in Chicago, Illinois.

Abex discontinued the manufacture and sale of asbestos-containing friction products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board