

INTERROGATORY NO. 6: Identify any and all companies, businesses, corporations, and/or ventures in which this Defendant owns, or at any time has owned, more than a ten percent (10%) interest and which engaged in the design, manufacturing, selling, distributing, applying, installing, or relabeling of products containing asbestos.

ANSWER TO INTERROGATORY NO. 6:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Pursuant to the Court's April 13, 2000 Order, Abex's answer to this interrogatory is limited to the years between 1930 and 1980.

Abex also 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 further objects to this interrogatory to the extent to which it purports to seek information or materials that have been gathered, received or prepared in the course of litigation, or which are otherwise subject to the attorney-client privilege, protected by the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Subject to and without waiving these objections, and insofar as Abex understands this interrogatory, see Answer to Interrogatory Nos. 3 and 14. In addition, Abex purchased S.K. Wellman Company in 1963. Upon information and belief, S.K. Wellman Company did not manufacture or distribute asbestos-containing products prior