

Subject to and without waiving these objections, Abex's asbestos-containing automotive friction products were manufactured in Detroit, Michigan (approximately 1927 to early- to mid-1950s); Salisbury, North Carolina (1974 to 1987), and Winchester, Virginia (1947 to 1987).

INTERROGATORY NO. 13:

Has Defendant, at any time, entered into a "rebranding" agreement with any other company, either as a buyer or a seller, concerning any asbestos-containing products and/or materials? If so, please state:

- (a) The name of the company manufacturing the asbestos products under such agreement;
- (b) The trade name affixed to such products;
- (c) The periods of time covered by each such agreement;
- (d) The volume (in dollars amounts) of each such transaction;
- (e) The purchaser of such products;
- (f) Does Defendant currently have in its possession any of the writings or contracts concerning such rebranding agreement?

RESPONSE TO INTERROGATORY NO. 13:

See General Objections. Abex further objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous.

Abex further objects to this interrogatory on the ground that the terms "rebranding" and "the purchaser" are undefined or insufficiently defined, and call for speculation.

Abex further objects to this interrogatory to the extent to which it seeks information regarding time periods and products that are not at issue in this case, on the ground that such information lacks relevance, and is not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent to which it