

INTERROGATORY NO. 37: With respect to each product listed in response to Interrogatory No 19, state.

- (a) The type of asbestos contained in the product as it was first manufactured,
- (b) The percentage of asbestos contained in the product as it was first manufactured;
- (c) Any modification to the product which altered the percentage or type of asbestos in the product and the dates of such modification;
- (d) The source of asbestos in each product;
- (e) The color, physical characteristics, and appearance of each products;
- (f) Any and all other names under which the product was sold, at any time;
- (g) The number and date of each patent or patent application for each product,
- (h) If the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted, the identity of the person(s) who made the decision to delete the asbestos, and the date the product was first produced without the asbestos;
- (i) If the product is no longer produced, all reasons it was discontinued, the identity of the person(s) who made the decision to discontinue the product, the brand name of the replacement product, and the date the replacement product first went into production; and
- (j) The reasons why asbestos was used as an ingredient in each such product

ANSWER TO INTERROGATORY NO. 37:

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

Abex also objects to this interrogatory on the ground that it purports to shift the burden of establishing product identification from plaintiffs to Abex.