

RESPONSE TO INTERROGATORY NO. 4.1:

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

Abex further objects to this interrogatory on the grounds that it is compound, unduly burdensome, oppressive, harassing, not reasonably limited in scope as to time, location, or products at issue, and is not relevant or reasonably calculated to lead to the discovery of admissible evidence.

Objection is made further to this interrogatory on the ground that the terms "distributing" and "rebranding" are undefined or insufficiently defined, and call for speculation.

Abex further objects to this interrogatory on the ground that it purports to seek information about entities other than Abex.

Abex further objects to this interrogatory on the ground that the information it seeks lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 5:

Has Defendant ever engaged in the mining, manufacturing, selling, marketing, installation or distribution of asbestos-containing products? If so, please state the following:

- (a) The name of the company engaged in the activity (whether it is Defendant, Defendant's predecessor, Defendant's subsidiary or some other entity related to Defendant);
- (b) As to each product mined, manufactured, sold marketed, installed or distributed, please state the following:
 - (1) The trade or brand name.
 - (2) Its identification number (model, serial number, etc.).
 - (3) The time period it was manufactured, mined, marketed, distributed or sold.
 - (4) Its physical description including color, general composition, and form.