

RESPONSE TO REQUEST FOR PRODUCTION NO. 5: Abex never manufactured or sold any asbestos-containing building products. Documents which may reflect this information concerning Abex's asbestos-containing automotive friction products are on file and can be made available for inspection and copying at a mutually convenient time and place.

6. Any and all labelling or relabelling agreements concerning asbestos products in existence since 1935 between the answering Defendant and other persons, including other Defendants.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6: Documents which may be responsive to this request are on file and can be made available for inspection and copying at a mutually convenient time and place.

7. Any and all documents or other communications, including but not limited to interoffice communications, that are now or have ever been in the possession, custody, or subject to the control of the Defendant, and which addressed the causal connection between exposure to asbestos or asbestos products and disease.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7: Abex objects to this request on the ground that it fails to distinguish among the different types of raw asbestos fibers, asbestos-containing building products and asbestos-containing automotive friction products. To the extent this request seeks materials related to the working conditions of Abex employees, it is objected on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this request on the grounds that this request seeks information or materials prepared in the course of litigation or which is otherwise protected by the