

3. Lack of Relevance

116. State whether defendant possessed any ownership interest in any firm or corporation involved in the mining, processing or sale of raw asbestos or products containing asbestos which were domiciled, headquartered or doing business in the British Isles for any year from 1948 to 1963.

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden
2. Overly Broad
3. Lack of Relevance

Without waiving these objections, Abex states that to the best of current knowledge and belief, Abex never possessed any such ownership interests.

117. State whether any such firm or corporation possessed any ownership interest in defendant from 1948 to 1963.

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden
2. Overly Broad
3. Lack of Relevance

Without waiving these objections, Abex states that it is not aware of any such ownership interests.

118. State whether the defendant entered into licensing agreements with any British or German concerns which manufactured products containing asbestos.