

If the answer to Interrogatory No. 10 is "Yes", with respect to each such predecessor:

- (1) State its full and correct name;
- (2) State its principal place of business;
- (3) State its State of Incorporation;
- (4) State its date and manner of acquisition by Defendant;
- (5) Whether this predecessor was, at any time, authorized to transact business in the State of Illinois; and
- (6) Identify any and all documents referring to, relating to or reflecting the acquisition.

RESPONSE TO INTERROGATORY NO. 11:

See Abex's response to Interrogatory No. 10, above.

INTERROGATORY NO. 12:

Has Defendant ever acquired from another corporation, company, or business, by any means other than those specified in Interrogatory No. 10, assets or rights to manufacture, sell, distribute or apply asbestos or asbestos-containing products?

RESPONSE TO INTERROGATORY NO. 12:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of these objections, to the best of its's knowledge, information and belief, Abex responds, no.

INTERROGATORY NO. 13:

If the answer to Interrogatory No. 12 is "Yes", with respect to each such acquisition: