

- (b) The date(s);
- (c) Amount;
- (d) Types received;
- (e) Identify and produce all documents relating to such purchase;

ANSWER TO INTERROGATORY NO. 11: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, Abex does not possess sufficient knowledge concerning its purchase of raw chrysotile asbestos fiber. Abex is generally aware that chrysotile asbestos fiber, the only asbestos fiber ever utilized by Abex, was purchased from the following companies at various periods since 1950:

Asbestos Corporation, Ltd.
Thetford Mines
Quebec, Canada

Bell Asbestos Mines, Ltd.
Thetford Mines
Quebec, Canada

Lake Asbestos
Lac d'Amiante
Black Lake
Quebec, Canada

Johns-Manville Corp.
Canadian Johns-Manville Corp.
Asbestos, Canada

GAF Corp.
Hyde Park, Vermont