service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

ANSWER: Pneumo Abex Corporation, a Delaware corporation, is the successor-in-interest to Abex Corporation. Abex Corporation was incorporated under the laws of the State of Delaware. The registered agent for service of process in the state of Texas is Prentice-Hall Corporation System, Inc. Pneumo Abex Corporation's principel place of business is New York, New York.

INTERROGATORY NO. 3.:

Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers" If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in the Dallas County asbestos litigation.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and unduly burdensome. Abex also objects to this interrogatory on the grounds that the term "material containing asbestos fibers" is undefined. Abex objects to this interrogatory on the grounds that it is compound. Abex further objects to this interrogatory on the grounds that it fails to distinguish among the different types of raw asbestos fibers, asbestos-containing building products and asbestos-containing friction products. Subject to and without waiving these objections and to the extent Abex understands this question Abex states that, Abex has never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987.