

mentation it intends to offer into evidence at a trial of this matter, and reserves the right to supplement this Response when such a determination has been made.

94. Please state if the defendant intends to assert a defense of contributory negligence. If so, state all facts on which the defendant bases its contention that plaintiffs were contributorily negligent.

ANSWER: Abex objects to this Interrogatory on the grounds that it is premature. Without waiving this objection, Abex states that it has not yet determined whether it will interpose said defense, and reserves the right to supplement this Response when such a determination has been made.

95. Please state if the defendant intends to assert a defense of incurred and/or assumed risk. If so, state all facts on which the defendant bases its contention that plaintiffs incurred and/or assumed the risk.

ANSWER: Abex objects to this Interrogatory on the grounds that it is premature. Without waiving this objection, Abex states that it has not yet determined whether it will interpose said defense, and reserves the right to supplement this Response when such a determination has been made.

96. Please state if the defendant intends to assert that it has not manufactured, sold, distributed, or supplied asbestos materials to North Carolina.

ANSWER: Abex objects to this Interrogatory on the grounds that it is premature. Without waiving this objection,