

7. What is the name, address and job title of each individual who participated in the design and preparation of manufacturing specifications for each such product listed in response to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories?

ANSWER: Abex objects to this interrogatory on the grounds that it is hopelessly overly broad and burdensome. Abex further objects on the grounds that, in seeking information concerning products to which the plaintiff does not allege her decedent was exposed, this interrogatory lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

8. As to each product listed in response to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories, please describe how each product was to be cut, shaped, scribed, mixed and applied on the job. (In answering this question, give particular reference as to whether or not the materials were to be sawed, cut, or ground on the job.)

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and assumes facts not established. Abex further objects on the grounds that, in seeking information concerning products to which the plaintiff does not allege her decedent was exposed, this interrogatory lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, Abex's asbestos-containing automotive friction parts were generally sold in ready-to-use form.

9. Based upon the material contents of your asbestos-containing brake lining products, the method of manufacturing, and the method of application, please state which of your asbestos-containing brake lining products as listed in Interrogatory No. 5 to Plaintiff's First Set of Interrogatories could be applied by a worker without creating dust.