

INTERROGATORY NO. 48.2:

State whether any records concerning the manufacture, sale, supply, distribution, advertising, delivery, use or installation or tear-out of asbestos-containing products have been destroyed or discarded and if so, indicate:

- (a) the date and location of such destruction or discard;
- (b) the custodian and location of such records prior to their destruction or discard and the identity of each employee, representative, official or agent who ordered, authorized or supervised such destruction or discard.

RESPONSE TO INTERROGATORY NO. 48.2:

See General Objections. Abex further objects to this interrogatory on the grounds that it is vague and ambiguous.

Abex further objects to this interrogatory on the ground that the term "destroyed" is undefined, and calls for speculation.

Subject to and without waiving these objections, and insofar as Abex understands this interrogatory, there were numerous record retention programs instituted by the former Abex Corporation, a diverse, highly decentralized corporation. It is impossible to give a meaningful response to the interrogatory as framed. If the interrogatory is narrowed to refer more clearly to specific categories or types of records, a meaningful response may be possible.

INTERROGATORY NO. 48.3:

For all documents, other than invoices, work orders and/or purchase orders, which relate to matters relevant to the all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, word processing or other computerized format)?
- (e) What manner of electronic format is used?