

42. As of January 1, 1965, identify the quantity of each of your asbestos-containing products [which] were stored in your warehousing facility or facilities awaiting sale to contractors or other concerns.

ANSWER TO INTERROGATORY NO. 42: Abex objects to this interrogatory on the grounds that it is burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further states it did not sell its asbestos-containing automotive friction products to "contractors."

43. Identify each and every witness you expect to call at the trial hereof and as to each expert witness provide all information required by the Texas Rules of Civil Procedure and this Court's orders and rules.

ANSWER TO INTERROGATORY NO. 43: Abex objects to this interrogatory on the grounds that it is premature and that it is not required to list each witness which it will call at trial. Abex has not yet determined which witnesses it intends to call at a trial of this matter and reserves the right to supplement this answer once such a determination is made..

44. Has Defendant ever received a copy of Fleischer, W. Drinker, P., et al., "Health Survey of Pipecovering Operations in Constructing Naval Vessels," J. Ind. Hyg. & Tox. 28: 9 (1946) or any document summarizing same? If so, please state:

Defendant;

- (a) When such copy was first received by
- (b) What evidence exists as to the date of its first receipt;
- (c) The identity of the custodian of the document first received;
- (d) The identity of all persons in Defendant's employ who reviewed, or were made aware of the contents of the above-referenced document;