

C. The dates of recall;

D. The purpose for the recall.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad, and contains undefined terms. Subject to and without waiving these objections Abex does not presently believe that Abex ever recalled any asbestos-containing products. See also Answer to Interrogatory No. 7.

INTERROGATORY NO. 54.:

Before 1970, did you ever manufacturer or sell products which did not contain asbestos and which could be substituted for your asbestos-containing products? If so, state the date such asbestos-free products were first placed on the market.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Abex further objects to this interrogatory on the grounds that the word "substitute" is undefined. Abex objects to this interrogatory on the grounds that it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory to the extent it seeks information on products which are not at issue in this case on the grounds that the information sought is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections Abex states Abex does not know when it first manufactured a non-asbestos containing product which could be substituted for asbestos containing products used for applications originally designed for particular asbestos containing products. See also Answer to Interrogatory No. 7.