

- (d) Whether Defendant used the substitute for asbestos to 1971;
- (e) Whether Defendant ever used the substitute for asbestos for high or low heat insulation.

RESPONSE TO INTERROGATORY NO. 45:

See General Objections. Abex further objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, argumentative, compound, vague, ambiguous and speculative.

Abex further objects to this interrogatory on the ground that the terms "asbestos containing products," "eliminate," "potential health hazards," "installing," "applying," "in place of asbestos," "chemical," "purpose" and "use" are undefined or insufficiently defined, and call for speculation.

Objection is made to this interrogatory on the ground that the term "contend" is argumentative, and calls for a legal opinion or conclusion which Abex is unqualified to render.

Abex further objects to this interrogatory on the ground that it purports to call for a medical or scientific opinion or conclusion which Abex is unqualified to render.

Abex further objects to this interrogatory on the ground that it purports to shift the burden of establishing causation from plaintiffs to the defendant.

Abex further objects to this interrogatory to the extent to which it seeks information regarding time periods and products that are not at issue in this case on the ground that such information lacks relevance, and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the ground that the information it seeks otherwise lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the ground that it assumes the truth of matters not established or matters not in evidence.