

INTERROGATORY NO. 27: With respect to each and every product listed in response to Interrogatory No. 19, provide a full and complete description of the package in which the product was sold, including, but not limited to, type of package, size, color and writings thereon.

ANSWER TO INTERROGATORY NO. 27:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory on the ground that it purports to shift the burden of establishing product identification from plaintiffs to Abex.

Abex further objects to this interrogatory to the extent it purports to seek information or materials regarding time periods and products that are not at issue in these cases, on the grounds that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. Abex objects to this interrogatory on the grounds that the information or materials it purports to seek otherwise lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

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

Subject to and without waiving these objections, insofar as Abex understands this interrogatory, and upon information and belief, some of Abex's asbestos-containing automotive friction products were generally packaged in plain, brown, or tan cardboard boxes according to size, with the end label being imprinted with colors. The brand name appeared on the packages as did the product name. Abex packaging varied from product to product over the many decades of its corporate existence. Upon further information and belief, Abex has no sample packages.