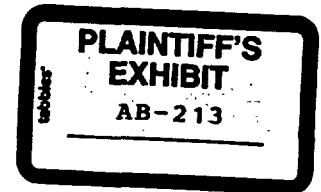


IN RE: ALL ASBESTOS-RELATED)
PERSONAL INJURY OR DEATH)
CASES FILED BY BARON &)
BUDD, P.C. OR TO BE)
FILED BY BARON & BUDD)
P.C. IN DALLAS COUNTY,)
TEXAS)

IN THE DISTRICT COURTS OF
DALLAS COUNTY, TEXAS
191ST JUDICIAL DISTRICT
RECEIVED
APR 01 1995
BARON & BUDD



PNEUMO ABEX CORPORATION'S
RESPONSES TO PLAINTIFFS MASTER
INTERROGATORIES AND REQUESTS FOR PRODUCTION

INTRODUCTION AND GENERAL OBJECTIONS

Pneumo Abex Corporation, successor-in-interest to Abex Corporation ("Abex"), by and through its attorneys of record, Bourland, Kirkman & Seidler L.L.P., generally objects to these requests and interrogatories on the grounds that they are unduly burdensome, oppressive, vague, overly broad as to time, scope and location, lack particularity, and are repetitive. As a result of the failure by plaintiff to specify relevant time periods, many of the requests and interrogatories fail to distinguish relevant from irrelevant matter. Many of these discovery requests call for Abex to provide answers concerning events and records spanning a period of more than four decades. Consequently, the entire set of discovery requests is overly broad, unduly burdensome, oppressive and harassing, and beyond the scope of proper discovery.

Many of these requests and interrogatories call for Abex to characterize the state of knowledge or awareness of a corporation at any