

INTERROGATORY NO. 23:

Before placing in the market the asbestos containing products that Defendant, mined, manufactured, sold, marketed, installed or distributed on the market, did Defendant make or cause to be made, any studies to determine whether their asbestos-containing products would be hazardous to people? If so, please state:

- (a) The date of said studies;
- (b) What studies were done; and
- (c) The titles of each study.

RESPONSE TO INTERROGATORY NO. 23:

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

Abex further objects to this interrogatory on the ground that the terms "marketed," "distributed," "studies," "hazardous" and "people" are undefined or insufficiently defined, and call for speculation.

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.