

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.

INTERROGATORY NO. 55:

Have any products you identified in your Answer to Interrogatory Nos. 52 and 54 not performed as intended? Please list all such products that have not performed as intended.

ANSWER: See Answers to Interrogatory Nos. 7, 52 and 54.

INTERROGATORY NO. 56:

Did your company or its predecessor(s) or subsidiaries ever make, order, or arrange for any industrial hygiene surveys regarding asbestos or asbestos-containing dust? If so, give the date of such surveys and state who, or what entity, was responsible for completion of such surveys.