

1 INTERROGATORY NO. 106:

2 Please state whether the defendant at any time between 1930  
3 and 1972 had an International Division.

4 RESPONSE:

5 Yes.

6 INTERROGATORY NO. 107:

7 If the answer to the preceding interrogatory is affirmative,  
8 please state when the International Division was created and  
9 where it has been headquartered from its inception.

10 RESPONSE:

11 Abex International, S.A., headquartered in Geneva, was  
12 incorporated in 1965 in Switzerland.

13 INTERROGATORY NO. 108:

14 Please state whether the defendant has ever had a division  
15 which exported raw asbestos or asbestos-containing products. If  
16 so, please state whether said division supplied any British manu-  
17 facturer of motor vehicles or machinery products with any compo-  
18 nent parts which contained asbestos between the years 1930 and  
19 1972.

20 RESPONSE:

21 The answer is "no" as to raw asbestos. As to asbestos-  
22 containing products, based upon information available at this  
23 time, defendant responds that it does not believe it has sold to  
24 any British manufacturer of motor vehicles or machinery products.

25 INTERROGATORY NO. 109:

26 Please state whether defendant sold or distributed any as-  
27 bestos-containing products to any British repair business or  
28 entity engaged in mechanical repair, or distribution of this