INTERROGATORY NO. 15: If the answer to any sub-part of Interrogatory No. 14 is "Yes", with respect to each such transaction:

(a) Identify all parties to the transaction;

(b) Identify the subject matter of the transaction;

(c) State the date of the transaction; and,

(d) Identify any and all documents, referring to, relating to or reflecting the transaction.

ANSWER TO INTERROGATORY NO. 15:

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 to the extent to which it purports to seek information or materials that have been gathered, received or prepared in the course of litigation, or which are otherwise subject to the attorney-client privilege, protected by the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, Abex discontinued the manufacture and sale of asbestos-containing friction