

INTERROGATORY NO. 25:

Identify each and every source from which Defendant, any predecessor or related company, obtained raw asbestos and/or asbestos-containing material used by Defendant, any predecessor or related company, to manufacture or process any product listed in response to Interrogatory No. 19.

RESPONSE TO INTERROGATORY NO. 25:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of these objections, Abex does not possess sufficient knowledge concerning its purchase of raw chrysotile asbestos fiber. Abex is generally aware that chrysotile asbestos fiber, the only asbestos fiber ever utilized by Abex, was purchased from the following companies at various periods since 1948:

Asbestos Corporation, Ltd.
Thetford Mines
Quebec, Canada

*omit
WAAC*

Bell Asbestos Mines, Ltd
Thetford Mines
Quebec, Canada

Lake Asbestos
Lac d' Amiante
Black Lake
Quebec, Canada

Johns-Manville Corp.
Canadian Johns-Manville Corp.
Asbestos, Canada

GAF Corp.