INTERROGATORY NO. 80: With respect to each disease set forth in Interrogatory No. 79

(a) Identify the official who first obtained the knowledge, notice, information or understanding to which the interrogatory refers;

(b) Identify any and all documents referring to, relating to or reflecting such knowledge, notice, information or understanding; and

(c) Describe what, if any, action said official, Defendant, any predecessor or any related company took in response to such knowledge, notice, information or understanding.

ANSWER TO INTERROGATORY NO. 80:

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 call for a legal opinion or conclusion which Abex is unqualified to render.

Abex further objects to this interrogatory on the ground that it purports to call for a medical or scientific opinion or conclusion which Abex is unqualified to render.

Abex objects to this interrogatory on the ground that it purports to shift the burden of establishing causation from plaintiffs to Abex.

Abex also objects to this interrogatory on the ground that it assumes the truth of matters not established or matters not in evidence.

Abex further objects to this interrogatory on the ground that it is speculative inasmuch as it fails to distinguish among raw asbestos, asbestos contained in building insulation products and/or asbestos-containing automotive friction products, and/or among the different types of asbestos fibers. Because the asbestos fiber