(e) The names and addresses of the persons who notified you of their asbestos related disease.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, lacks particularity as to what information is being requested and is vague and ambiguous in that "outside or independent unit" is not defined. Abex cannot respond absent such definition.

16. Set forth each and every method, if any, used by defendant to restrict release of asbestos dust, fibres or materials out of the transport containers or from the products themselves, indicating with regard to each such method the time period it was used.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, asbestos contained in Abex products is encapsulated and resin-bonded.

17. Set forth in detail with regard to each and every sale, delivery or supply of an asbestos product to plaintiff's employer the following:

(a) The date of such sale or delivery;

(b) The generic name of the asbestos product;

(c) The brand name of the asbestos product;

(d) The trademark name of the asbestos product;

(e) The chemical composition of such asbestos product;

(f) The quantity of each such sale, delivery or supply, and the price paid by employer for the shipment;

(g) The invoice and purchase order number of