

6. State the name and positions of all corporate officers or officials having the responsibility of creating, directing, setting or determining the course, of action and/or the responsibility of your firm s activities with regard to the mining, manufacturing, processing, sale and/or packaging of asbestos products since 1939, insofar as it relates to asbestos and health.

ANSWER TO INTERROGATORY NO. 6: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

7. For each asbestos product mined, manufactured, processed, refined, sold or distributed by you between the years 1939 and 1980, state:

- a. the date you commenced such activities;
- 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 asbestos content of such "asbestos product, supplier, type and percentage";
- f. the mineralogical and other constituents of such "asbestos product" and the percentage by weight of each such constituent;
- g. any modifications to the product which altered the percentage or type of asbestos in the product and the dates of such modifications;
- h. the source of asbestos in each product.

ANSWER TO INTERROGATORY NO. 7: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex objects to the term "asbestos products." Abex never mined,manufactured, processed, refined, sold or distributed "asbestos products," but rather manufactured and sold automotive friction products, some of which contained chrysotile asbestos as