

9.2.04

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

4/5/01
Rose
File

IN RE: ASBESTOS LITIGATION)
FILED BY THE SIMMONS FIRM, L.L.C.)
)
Plaintiffs,)
)
vs.)
)
A.P. GREEN REFRACTORIES, et al.,)
)
Defendants)

**SUPPLEMENTAL
ANSWERS OF PNEUMO ABEX CORPORATION, AS SUCCESSOR-IN-INTEREST
TO ABEX CORPORATION, TO PLAINTIFFS' INTERROGATORIES**

Preliminary Statement and General Objections

Pursuant to the Illinois Rules of Civil Procedure and the Illinois Supreme Court Rules, defendant Pneumo Abex Corporation, as successor-in-interest to Abex Corporation ("Abex"), hereby objects to Plaintiffs' Interrogatories, as follows.

Abex objects to these interrogatories on the grounds that they are premature and purport to shift the burden of establishing product identification from plaintiffs to Abex

Abex also objects to these interrogatories on the grounds that they are compound, contain numerous terms that are vague and ambiguous and that they call for speculation

Abex further objects to these interrogatories to the extent they purport to seek information or materials unrelated to Abex's alleged liability in these actions and are not reasonably calculated to lead to the discovery of admissible evidence

Abex objects to these interrogatories on the grounds that they assume the truth of matters not established or matters not in evidence