

Do you or any of your subsidiaries, including foreign business entities, currently manufacture any products containing asbestos? If so, state:

- A. As to each product, whether such product is mined, manufactured, and/or marketed or sold.
- B. The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.
- C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.
- F. A description of the physical appearance of each product and its packaging.
- G. A detailed description of the intended uses of each of the named products.
- H. Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and unduly burdensome. Abex further objects on the grounds that information regarding any foreign subsidiary is irrelevant and not calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, Abex ceased manufacturing and selling its asbestos-containing automotive friction products in 1987 due to a shift in the demand of the automotive friction products market.

INTERROGATORY NO. 38.:

State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any