

installed or contracted to apply or install asbestos-containing products, and for each such site:

- (i) State whether the products you applied, installed or contracted to apply or install were included as part of the project's contract price or whether you applied the products that were provided at the worksite;
- (ii) Identify by manufacturer and trade name each and every asbestos-containing product applied or installed;
- (iii) State the date(s) during which said application or installation took place;
- (iv) Identify the employee(s) of Defendant who was (were) in charge of the job;
- (v) Identify the person or entity for which products were applied or installed; and
- (vi) Identify all documents relating to such contract, application or installation.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 22:

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 to the extent it purports to seek information or materials regarding time periods, products and work sites that are not at issue in these cases, on the grounds that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the grounds that the information or materials it purports to seek lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, Abex states that it did not apply, contract to apply, install or engage in the business of applying or installing asbestos-containing products.

INTERROGATORY NO. 23: Has this Defendant, any predecessor or any related company, ever engaged in the business of mining asbestos? If so: