

- (d) types received;
- (e) identify and produce all documents relating to such purchase.

ANSWER TO INTERROGATORY NO. 11: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, Abex does not possess complete knowledge concerning its purchase of raw chrysotile asbestos fiber. Abex is generally aware that chrysotile asbestos fiber, the only asbestos fiber ever utilized by Abex, was purchased from the following companies at various periods since 1950:

Asbestos Corporation, Ltd.
Thetford Mines
Quebec, Canada

Bell Asbestos Mines, Ltd.
Thetford Mines
Quebec, Canada

Lake Asbestos
Lac d'Amiante
Black Lake
Quebec, Canada

Johns-Manville Corp.
Canadian Johns-Manville Corp.
Asbestos, Canada

GAF Corp.
Hyde Park, Vermont

Vermont Asbestos Group, Inc.
Hyde Park, Vermont

12. Identify each business entity from whom you have received finished asbestos products if you are not a miner or a distributor of mined asbestos indicating:

- (a) name and address of said entity;
- (b) the date(s);
- (c) amount(s);