

- (c) The date same was prepared;
- (d) The media used to disseminate the sales material.

RESPONSE TO INTERROGATORY NO. 42:

See General Objections. Abex further objects to this interrogatory on the grounds that it is overly broad and unduly burdensome.

Abex further objects to this interrogatory on the ground that it purports to shift the burden of establishing product identification from plaintiffs to Abex.

Abex further objects to this interrogatory to the extent to which it seeks information regarding time periods and products that are not at issue in this case on the ground that such information lacks relevance, and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the ground that the information it seeks otherwise lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent to which it requests knowledge, information or materials which are not within the personal possession or control of Abex, its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of Abex.

Subject to and without waiving these objections, Abex does not know with certainty each material which was used to promote or advertise its asbestos-containing automotive friction products.

Furthermore, Abex does not have specific information concerning which advertising agents may have been employed to promote its products. However, documents generally