Subject to and without waiving any of these objections, see objections and response to Interrogatory No. 5 Subpart (b)(2), above.

INTERROGATORY NO. 9:

Did Defendant or any of Defendant's distributors, as listed in response to Interrogatory Nos. 8.1, 8.2, and/or 8.3 have sales representatives who specifically called on the sites listed on Exhibit A, attached hereto, from 1945 to 1975? If your response is yes, as to each site listed on Exhibit A, please state the following:

(a) The name and last known address of each such representative and whether they are still employed by Defendant;

(b) The period of time they acted as your representative;

(c) Their general responsibility as to each facility;

(d) Whether that person is still alive; and

(e) Any documents relating, referring or pertaining thereto.

RESPONSE TO INTERROGATORY NO. 9:

See General Objections. Abex further objects to this interrogatory on the ground that it assumes the truth of matters not established or matters not in evidence.

Abex further objects to this interrogatory on the ground that it purports to seek information about entities other than Abex.

Subject to and without waiving these objections, see objections and responses to Interrogatories Nos. 8.1, 8.2 and 8.3, above.

INTERROGATORY NO. 9.1:

Identify all managers and sales personnel responsible for your sales or installation of any asbestos-containing products in Ohio from 1930 to the present and state their position, last known address and the local or regional office through which they were employed.

RESPONSE TO INTERROGATORY NO. 9.1:

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