

the said product was/is sold in a solid, loose, powdered or other form;

- (f) Identify the location of each plant or facility which produces each of the aforesaid asbestos products.

ANSWER TO INTERROGATORY NO. 6: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, Abex states as follows:

(a) Brake lining;

(b) Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987.

(c) Friction products are generally designed to assist in the stopping or control of a moving object.

(d) Abex objects to this interrogatory on the grounds that it seeks trade secret information. Subject to and without waiving this objection, Abex's asbestos-containing automotive friction products contained approximately 25 to 65 percent chrysotile asbestos only.

(e) Asbestos-containing automobile brake lining was shaped into curved, linear segments in such dimensions as required by the specifications, characteristics and uses established by the manufacturer of the vehicle or the equipment on which the lining would have been applied.

(f) Abex objects to this subpart on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.