

Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Abex further states that it did not manufacture or sell "asbestos products."

INTERROGATORY NO. 42:

For each asbestos-containing product identified in Answer to Interrogatory No. 6, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestoscontaining products.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Abex further objects to this interrogatory on the grounds that it is speculative. Abex also objects to this interrogatory on the grounds that it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex also objects to this interrogatory on the grounds that it seeks information about entities other than Abex. It is impossible to give a meaningful Answer to the interrogatory as framed. Subject to and without waiving these objections see Answer to Interrogatory No. 7.

INTERROGATORY NO. 43: