

- (k) the product's trade or brand name;
- (l) the container in which the product was shipped (i.e., paper bags, cardboard boxes) including the size and amount of the container;
- (m) a description of any logos, writing impressions or identifying markings which appeared on the product, as well as a description of the package used, the dates that type of package was used, and any logos, product names, trademarks, etc. which appeared on the package;
- (n) whether the words "non-asbestos" or "asbestos free" were used on the package;
- (o) a detailed description of the intended method of preparation and application of the product;
- (p) a description of the physical appearance of the product, including size, shape, color and texture.

RESPONSE TO INTERROGATORY NO. 8.05:

See General objections. Abex further objects to this interrogatory on the grounds that it is over broad, oppressive, harassing, otherwise unduly burdensome, compound, vague, ambiguous and speculative.

Abex further objects to this interrogatory on the grounds that it is compound, unduly burdensome, oppressive, harassing, not reasonably limited in scope as to time, location, or products at issue, and is not relevant or reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the ground that the terms "distribution" and "use" are undefined or insufficiently defined, and call for speculation.

Abex further objects to this interrogatory on the ground that the information it seeks lacks relevance to the issues arising in this case, and is not calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the grounds that it requires Abex to make a scientific conclusion, which it is not qualified to make.