

RESPONSE TO INTERROGATORY NO. 13.1:

See General Objections. Subject to and without waiving these objections, and insofar as Abex understands this interrogatory, Abex responds: No.

INTERROGATORY NO. 13.2:

Do you have within your custody, possession, or control any packages that presently or formerly packaged asbestos-containing products or were produced for the purpose of packaging asbestos-containing products contemporaneous with your manufacture sale or distribution of such asbestos-containing products? If so, provide the following:

- (a) a description of each such package;
- (b) the present location and custodian of each such package;
- (c) the date or approximate date on which each such package was produced.

RESPONSE TO INTERROGATORY NO. 13.2:

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

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