

INTERROGATORY NO. 25: Identify each and every source from which Defendant, any predecessor or related company, obtained raw asbestos and/or asbestos-containing material used by Defendant, any predecessor or related company, to manufacture or process any product listed in response to Interrogatory No 19.

ANSWER TO INTERROGATORY NO. 25:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory on the grounds that the term “related company” is vague and ambiguous and calls for speculation.

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 objects to this interrogatory to the extent it purports to seek information or materials regarding time periods and products that are not at issue in these cases, on the grounds that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. Abex also objects to this interrogatory on the grounds that the information or materials it purports to seek otherwise lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

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

Subject to and without waiving these objections, Abex does not possess complete knowledge concerning its purchase of raw chrysotile asbestos fiber, the only asbestos fiber ever utilized by Abex in the manufacture of its asbestos-containing automotive and railroad friction products.

However, upon information and belief, Abex is generally aware that, during