

O. To the extent the information contained herein differs in any respect from any prior answer or response to discovery, these responses shall be deemed to update and supersede any prior answers or responses in any and all actions.

RESPONSES

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph or picture of each asbestos-containing product that Defendant has ever mined, manufactured, sold, marketed, installed, and/or distributed.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

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

Objection is made to this request on the ground that the terms "marketed" and "distributed" are insufficiently defined, and calls for speculation.

Abex further objects to this request on the ground that it purports to shift the burden of establishing product identification from plaintiffs to Abex.

Abex further objects to this request 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 request 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 request on the grounds that is overly broad, oppressive, harassing and otherwise unduly burdensome, and call for speculation to the extent to which it requests information which is not within the personal knowledge, possession or control of Abex,