INTERROGATORY NO. 38: Identify any and all facilities at which Defendant, any predecessor or any related company, at any time, manufactured or processed asbestos-containing products, or processed raw asbestos. For each such facility identified:

(a) State the date(s) which said facility was owned and/or operated by Defendant, any predecessor or any related company;

(b) State the date(s) during which asbestos-containing products and/or raw asbestos were manufactured or processed, at said facility; and,

(c) Identify each person serving as the manager or supervisor of said facility during any time which the facility has been owned and/or operated by Defendant, any predecessor or any related company, and state the date(s) of the tenure as manager or supervisor for each.

ANSWER TO INTERROGATORY NO. 38:

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 "any 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 ground that it assumes the truth of matters not established or matters not in evidence

Abex further objects to this interrogatory on the ground that it is speculative