

INTERROGATORY NO. 120: Has Defendant, any predecessor or any related company, ever been cited, warned, fined or sanctioned for, any violation of a federal or state statute, law, rule, ordinance, code, administrative order, executive order, or the like, by any federal or state governmental entity, which violation concerned asbestos in any way?

ANSWER TO INTERROGATORY NO. 120:

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

Pursuant to the Court's April 13, 2000 Order, Abex's answer to this interrogatory is limited to the years between 1930 and 1980.

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 grounds that the information or materials it purports to seek lack relevance to the issues arising in these cases and are not calculated to lead to the discovery of admissible evidence. To the extent it purports to seek information or materials regarding the working conditions of Abex employees, this interrogatory is further objected to on the grounds that such information or materials lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

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

Abex also objects to this interrogatory on the ground that it is speculative inasmuch as it fails to distinguish among raw asbestos, asbestos contained in building insulation products and/or asbestos-containing automotive friction products, and/or