

by: State the first and last dates on which any asbestos-containing product was manufactured

- (1) Defendant;
- (2) each and every predecessor; and
- (3) each and every related company.

RESPONSE TO INTERROGATORY NO. 16:

See General Objections. Abex further objects to this interrogatory on the ground that it is compound, overly broad and unduly burdensome. In addition, this interrogatory seeks information concerning time periods and products not at issue in this case, and Abex further objects on the ground that such information lacks relevance and, therefore, is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of these interrogatories, Abex responds that it manufactured and sold various asbestos-containing automotive friction products during various periods from approximately 1927 to 1987.

INTERROGATORY NO. 17:

State the first and last dates on which any asbestos-containing product was specified, sold, distributed, applied and/or installed within the United States by:

- (1) Defendant;
- (2) each and every predecessor; and
- (3) each and every related company.

RESPONSE TO INTERROGATORY NO. 17:

See Abex's response to Interrogatory No. 16, above.

INTERROGATORY NO. 18: