

10. If the answer to the preceding Interrogatory is in the affirmative, state:

a) Where the Defendant has sold or distributed such products since 1960.

ANSWER: Abex objects to this Interrogatory on the grounds that said Interrogatory seeks irrelevant and immaterial information and is not reasonably calculated to lead to the discovery of admissible evidence

b) How long the Defendant has sold or distributed such products.

ANSWER: Abex objects to this Interrogatory on the grounds that said Interrogatory seeks irrelevant and immaterial information and is not reasonable calculated to lead to the discovery of admissible evidence

11. If the Defendant has discontinued manufacturing and/or selling asbestos products, please state the reason or reasons therefor.

ANSWER: Not applicable.

12. Please state the names of trade association periodicals to which the Defendant subscribed from 1928 to the present date. State whether or not the Defendant had any knowledge of any articles being printed in industry trade journals, essays, memoranda and other