

- G. The date asbestos was removed from such products, if ever, and the reasons therefor.
- H. A description of the physical appearance of each of the named products.
- I. A detailed description of the intended uses of the named products.
- J. Identify the last year that you sold each asbestos containing product.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and unduly burdensome. To the extent this interrogatory seeks information concerning time periods during which the plaintiff does not allege exposure to asbestos-containing products, it is objected to on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex objects to this interrogatory to the extent that it seeks confidential, trade secret, or other proprietary information or materials. Subject to and without waiving these objections Abex states:

(A) Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987.

(B) Abex states that it never mined asbestos. Abex Corporation was incorporated as The American Brake Shoe and Foundry Company in New Jersey in 1902 and was reincorporated as that company in 1916 in Delaware. In 1926, The American Brake Shoe and Foundry Company caused to be incorporated a New York corporation entitled American Brake Materials