J. Abex objects to plaintiffs' interrogatories on the grounds that plaintiff has failed to identify Abex as the brand, trade name, and/or manufacturer of any asbestos products to which plaintiff was allegedly exposed. Without any identification by plaintiff of specific products, Abex cannot adequately determine which interrogatories are proper and relevant to this action.

K. In an effort to overcome these limitations, Abex's counsel has conducted a reasonably diligent review of records and inquiry of available persons. Abex has responded in good faith to these interrogatories based upon available information. Because of these limitations on Abex's information, the responses that follow are based only upon this limited information and belief. The statements contained in these responses, therefore, are not and cannot be deemed admissible evidence under the applicable rules of evidence as non-hearsay facts asserted by a party with first-hand knowledge. Abex continues to investigate issues relevant to this action and reserves the right to introduce additional evidence at trial which is produced in the course of its further investigation or review of information.

L. Abex states that these responses are accurate as of the date made. However, Abex's investigation of information that may be responsive to these discovery requests is continuing and Abex reserves the right to supplement or amend its responses as this investigation continues.

M. At the present time, Abex has not conducted discovery or made a review of discovery conducted by other parties. Abex reserves the right to supplement or amend its responses as this review and further discovery continues.

N. Abex does not concede that any of its responses to plaintiffs' interrogatories are or will be admissible evidence at a trial of this action, and Abex does not waive any objection, on any ground, whether or not asserted herein, to the use of any such response at trial.