the information or materials it purports to seek lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, and to the best of current and reasonably available information and belief, the following individuals may have or may have had information responsive to this interrogatory:

Indelicato, Albert
Bretz, Earl L., Jr.
Cvitkovich, Steven
Feierabend, Eric H.
Francis, W. H.
Kleeschulte, David G.
Mallory, Charles B.
Nelson, Robert
Parker, F. R.
Blume, William
Merkle, Timothy
Spokes, Raymond
Pearce, Richard
Kwolek, John
Griffith, Arvon
Nelson, Robert

None of the above-referenced individuals is currently an officer, director or employee of Abex. This answer is based upon such information as is currently and reasonably available to Abex and Abex reserves the right to supplement or amend this answer when and if additional relevant information or documentation becomes available, including any provided by plaintiffs, at the appropriate time. Discovery and investigation are continuing.

INTERROGATORY NO. 41: Has Defendant, any predecessor or any related company, at any time, designed, manufactured, processed, sold, distributed, supplied, applied, installed or contracted to apply or install any product which contained vermiculite?