INTERROGATORY NO. 24: Has this Defendant, any predecessor or any related company ever purchased and resold raw asbestos? If so, with respect to each such purchase and resale.

(a) State the date(s) of the transaction,

(b) Identify any and all parties from which the raw asbestos was purchased; and

(c) Identify any and all parties to which the raw asbestos was sold.

ANSWER TO INTERROGATORY NO. 24:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory on the grounds that the term "any related company" is vague and ambiguous and calls for speculation.

Subject to and without waiving these objections, insofar as it understands this interrogatory, and upon information and belief, Abex is not aware that it ever purchased and then resold raw asbestos

Abex discontinued the manufacture and sale of asbestos-containing friction products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all the records and documents that might be responsive to this interrogatory

The available information, from which Abex would prepare a response to this interrogatory, is contained in files and records maintained by Abex To prepare a response to this interrogatory would necessitate the preparation or the making of a compilation, abstract, audit, or