

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden
2. Overly Broad
3. Lack of Relevance

119. If the answer to the preceding question is affirmative, list for the years 1947 to 1964:

(a) The name of each such British or German concern;

(b) The year the agreement was entered into and all years between 1947 and 1964 that it was in effect;

(c) Describe the type products manufactured by such licensees including:

- (i) The per cent composition of asbestos;
- (ii) The use of the products;
- (iii) Whether the products were marketed in the United States.

ANSWER: See Response to Interrogatory 118.

120. State whether the defendant at any time between 1945 and 1970 had an International Division and if yes, state the name of said Division and its years of operation.

ANSWER: Abex objects to this Interrogatory on the grounds of lack of relevance.

121. If your company, or your predecessor ever devised a brake lining product which does not contain asbestos, state what prompted your company to devise such brake lining product not containing asbestos.