

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects on the grounds that, in seeking information concerning products to which the plaintiff does not allege her decedent was exposed, this interrogatory lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, see answer to interrogatory No. 8.

10. Do any written memoranda, specifications, blueprints or other written materials of any kind or character now exist relating to the design and preparation of the asbestos-containing brake lining products listed in response to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories? If so, please:

- (a) List each such written material or document;
- (b) Identify the person or persons presently in possession of each such document;
- (c) State where each such document is located.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and seeks trade secret or confidential information. As worded, this interrogatory is so overly broad that it is impossible for Abex to render a meaningful response. Abex further objects on the grounds that, in seeking information concerning products to which the plaintiff does not allege her decedent was exposed, this interrogatory lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

11. Prior to releasing the asbestos-containing brake lining products listed in your response to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories to the public for sale, were any tests (either animal or human) conducted on said products