

(a) Removing or installing your friction products containing asbestos;

(b) Tearing down the product during repair and maintenance functions.

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

1. Burden
2. Overly Broad

Without waiving these objections, Abex states that as it does not have control over others' jobsites where its products are used, no testing in this regard would have been performed.

74. Please identify all texts, articles, publications, pamphlets, standards and rules upon which you intend to rely at the time of the trial to support your case.

ANSWER: Abex objects to this Interrogatory on the grounds that it is premature. Without waiving this objection, Abex states that it has not yet determined which such items in this regard it intends to rely upon at a trial of this matter, and reserves the right to supplement this response when such a determination has been made.

75. State whether or not you had an opinion in 1960 as to whether or not the concentration of airborne asbestos fibers at sites at which your asbestos containing brake lining products were being applied or removed by mechanics were within the prescribed threshold limit values for 1960 when said application was being performed and state your opinion and the basis for your opinion and list all publications or communications upon which you relied in formulating said opinion.