

relating to asbestos-containing automotive friction products manufactured by Abex.

38. For each product identified in answer to Interrogatory No. 1, state whether the production and/or sale of the product has been discontinued and, if so:

- (a) State when it was discontinued;
- (b) State with specificity and particularity all the reasons for the discontinuance;
- (c) Identify each individual who participated in the decision to discontinue production and/or sale and describe in detail the extent of his participation;
- (d) Identify all documents which reflect, refer or relate to each such discontinuance;
- (e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER TO INTERROGATORY NO. 38: Abex objects to this interrogatory on the grounds that it 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, Abex ceased manufacturing and selling asbestos-containing automotive friction products in 1987. Abex further states that it ceased manufacturing and selling asbestos-containing automotive friction products due to a shift in the friction products market.

39. For each product identified in answer to Interrogatory No. 1, state whether the production and/or sale of that product has been limited and/or curtailed or reduced and, if so:

- (a) Describe how it was so limited or curtailed or reduced;
- (b) State when it was so limited, curtailed or reduced;