

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

Without waiving these objections, Abex states that as it does not have control over the ultimate use of its products, or over others' jobsites, Abex is without sufficient knowledge and information to respond to this Interrogatory.

72. Please describe and identify all tests and experiments conducted by you to determine whether or not asbestos fibers contained within your asbestos containing friction products would become airborne upon their being removed or used by mechanics. Please state the date of all tests and experiments and the results and conclusions of each test and/or experiment.

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

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

Without waiving these objections, Abex states that to the best of current knowledge, it never sponsored or contributed to any such research projects exclusively pertaining to the inhalation of asbestos by mechanics. Abex further states that as it did not have control over others' jobsites where its products are used, no testing in this regard would have been performed.

73. At any time prior to 1964 were any tests or studies conducted or sponsored by you to determine the level of dust or fiber concentration incident to: