

such information and state the full substance of the information supplied.

ANSWER TO INTERROGATORY NO. 18: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and lacks particularity as to what information is being requested.

19. For each label, brochure, or other written material describing or relating to the use of each product identified in answer to Interrogatory No. 1, produced by you or any person associated with you or any related company or association;

- (a) Describe its contents;
- (b) State when, where, how, and to whom it was distributed;
- (c) State the manner in which it was placed on or in the product container or whether it was separate from the product container, or whether it was separate from the product or container;
- (d) State whether any written, printed or graphic matter was present to warn of any harmful ingredient it might contain. If so, state:
 - (i) Whether a signal word, i.e., "danger", "warning" or "caution" was present;
 - (ii) Whether the signal word was printed in boldface, capital letters or different colored inks. Which?
 - (iii) The wording of the statements describing any hazard;
 - (iv) The wording of all directions and/or instructions pertaining to any method of use to avoid any hazard.
- (e) Identify each individual who participated in the writing of the label, brochure or other written materials and describe in detail the extent of his participation;
- (f) Identify each document which reflects, refers or relates to the information contained on the labels, brochures, or other written materials and/or the decision to include such information;
- (g) As to any information received orally in answer to this interrogatory, identify each person who supplied