

INTERROGATORY NO. 44:

Was it a foreseeable use of your asbestos-containing products that they may have been removed, stripped, or replaced at some time after installation?

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Abex also 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. Abex further objects to this interrogatory on the grounds that it seeks information about entities other than Abex. Subject to and without waiving these objections it was foreseeable that the friction material would be removed or replaced at the end of their useful life. Removal or replacement is not a use of the product.

INTERROGATORY NO. 45:

Before 1970, did you or your subsidiaries or predecessor(s) ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where your products were being used or installed to make or take dust level counts? If so, state when this procedure started, the purpose of such procedures, and all results of such procedures.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Abex also objects to this interrogatory on the grounds that it seeks information about entities other than Abex. Subject to and without waiving these objections, Abex states to the best of