

(c) The method used to distribute the warning etc. to persons who are likely to use or be in contact with the products.

(d) The date each such warning, etc. was issued.

(e) The name, address, and job classification of each person who presently has possession of the above described documents.

(f) If you will without a request for production, please attach a copy of such warning, etc.

(g) State whether any industrial psychologists or human factors engineers were consulted prior to utilizing such warnings, cautions, etc.

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 documents in this regard are on file and can be made available for inspection and copying upon receipt of an appropriate document request.

18. From 1930 until the present, did the asbestos friction products sold, mined, manufactured or distributed by you, contain any warning, caution, caveat or other statement on the product or its packaging.

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

1. Overly Broad
2. Lack of Particularity