(3) Identify and produce a copy of said warning or caution.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time and scope. Subject to and without waiving this objection, all asbestos-containing automotive friction products manufactured and sold by Abex were generally packaged in cardboard boxes according to size. The brand name of the product would appear on the package, as did the company name.

In approximately 1972, Abex commenced placing warning labels on all packages of asbestos-containing friction materials manufactured and sold. This warning information stated:

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE SERIOUS
BODILY HARM

20. Prior to releasing the asbestos product(s) listed in interrogatory 6 for sale, were any tests conducted on same to determine potential health hazards involved in the use, handling or exposure of the materials contained therein: If so, state:

(a) The identity of each individual or firm who conducted such tests;

(b) The date, purpose and result of each such test;

(c) Identify and produce all documents relating to such tests.