

INTERROGATORY NO. 64: Did Defendant, any predecessor or any related company, at any time, place any warning signs or labels on the containers in which any of the products listed in response to Interrogatory Nos. 19 and 42 were packaged?

ANSWER TO INTERROGATORY NO. 64:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory on the grounds that the term "any related company" is vague and ambiguous and calls for speculation.

Abex further objects to this interrogatory on the ground that it purports to shift the burden of establishing causation from plaintiffs to Abex.

Abex objects to this interrogatory to the extent it purports to seek information or materials regarding time periods and products that are not at issue in these cases, on the ground that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. Abex also objects to this interrogatory on the grounds that the information or materials it purports to seek otherwise lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the grounds that it assumes the truth of matters not established or matters not in evidence.

Abex objects to this interrogatory on the ground that it seeks to impose upon Abex a legal duty or obligation to which it was not subject.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, in the mid-1970s, and perhaps earlier, Abex commenced the placement of warning labels on its asbestos-containing automotive friction products. This label read as follows: