and copying upon receipt of an appropriate document request. Abex is without sufficient knowledge and information regarding each and every person or labor union who may have received copies of said pamphlet.

64. If the answer to the preceding Irterrogatory is in the affirmative, state:

(a) The Union.

(b) How said Union was informed.

(c) The date and place of said information or warning.

(d) The content and nature of said warning.

(e) The individual or individuals warned.

ANSWER: See Response to Interrogatory No. 63.

65. Did the defendant at any time give any advice, publication, warning, order, directive, requirement or recommendation, written or oral, including by U. S. Mail, which purported to:

(a) Advise the plaintiff personally and directly of the possible harmful effects of exposure to, or inhalation of, asbestos or asbestos containing products?

(b) Advise or recommend to the plaintiff personally and directly as to techniques, methods or equipment which would serve to reduce or guard against such potentially harmful exposure?

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

1. Burden

2. Overly Broad