

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

55. If defendant contends that plaintiff's injuries were in any way caused or aggravated by toxins, pollutants, or agents other than asbestos or tobacco, please state the name of each such agent, the injury it caused or aggravated, whether it has caused or aggravated his injuries, and every fact which supports the contention that plaintiff's injuries were so caused or aggravated.

ANSWER: See answer to interrogatory No. 40.

56. If defendant contends that the contact of asbestos friction materials against either brake drums or flywheels does not produce asbestos-containing dust, please set forth each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

57. If defendant contends that warnings are not necessary on asbestos-containing automotive products, including but not limited to friction materials, gaskets and shielding, please set forth each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

58. For each asbestos automotive product listed in your answer to interrogatory #6 of plaintiff's interrogatories to defendants, first set forth:

- (a) The type of asbestos fibre used in the product;
- (b) The percentage of the product comprised of