(b) The name or names of the persons conducting the studies and their address and describe in detail the extent of their participation;

(c) State what action, if any, was taken based upon studies in an effort to minimize or eliminate the effects of inhalation of asbestos dust or fibers upon those using or being exposed to the dust and fibers contained in such products as manufactured by your company;

(d) Identify each document which refers or relates to any information set forth in answer to this interrogatory;

(e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER TO INTERROGATORY NO. 30: Abex objects to this interrogatory on the grounds that it assumes facts not established. Proper use of Abex's asbestos-containing automotive friction products did not create or contribute to a health hazard.

31. What technique, if any, did and/or do you use to make dust samplings in the manufacturing and packaging production environment or at job sites where your materials are used?

(a) Set forth in detail the technique used, when it was commenced and when, if ever, it was concluded;

(b) State the purpose for administering such samplings;

(c) State the results of such samplings;

(d) State what action, if any, has been taken in response to the findings as to the dust samples;

(e) Identify each document which refers or relates to such sampling;

(f) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied;

(g) Identify the living person who has the most knowledge of matters discussed herein.