

- (f) Please attach a copy of the warning and date said warning was issued;
- (g) The name, address, and job classification of each person who presently has possession of the above-described documents;
- (h) The name or names and addresses of the company who provided, produced, or manufactured the boxes or containers on which the warning appeared and dates these boxes with the warnings appeared.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects on the grounds that, in seeking information concerning products to which the plaintiff does not allege her decedent was exposed, this interrogatory lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, in the mid-1970's at the latest, and perhaps earlier, Abex commenced the placement of warning labels on its asbestos-containing automotive friction products. This label read as follows:

Caution
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause Serious
Bodily Harm

Abex believes this warning was first placed on its asbestos-containing automotive friction products in order to comply with OSHA regulations. Abex does not believe the wording of this warning was ever changed.

Abex further states that in 1979 and 1982, it participated in the preparation and distribution of a pamphlet published by the Friction Materials Standards Institute, Inc. entitled, "Recommended Procedures for Reducing Asbestos Dust During Brake Servicing."