

e. The name, title and present address of the author of each such warning, and/or instructions.

f. Whether the warning or instructions were communicated or delivered to the distributor, and if so, state the name, address and telephone number of the persons who communicated and who received the instructions, and the date they were communicated to the purchaser.

g. Whether the instructions were communicated or delivered to the purchasers, and if so, state the name, address and telephone number of the persons who communicated and who received the instructions and the date communicated to the purchaser.

h. Whether the warning and instructions were physically attached to the product itself when sold and/or delivered, and if so, the method of attachment.

i. Whether any studies, evaluations or analyses of any potential hazards of your asbestos product were conducted by you prior to your use of each warning and/or instructions. If so, identify the study by date, author, title, and file number and state its present location.

j. Whether you have a copy of the warning and/or instructions in your possession at the present time, and if so, where it is located.

ANSWER TO INTERROGATORY NO. 12: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Because plaintiff has failed to identify exposure to any asbestos-containing products of this defendant, this interrogatory is further objected to on the grounds that it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. All other grounds for objection are reserved pending possible future product identification. Subject to and without waiving these objections, in 1972 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