

Abex further objects to this interrogatory on the ground that the information it seeks lacks relevance to the issues arising in this case, and is not calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent to which it requests knowledge, information or materials which are not within the personal possession or control of Abex, its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of Abex.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, Abex responds that it was a member of the following trade associations at various times:

- Asbestos Information Association/ Asbestos Information Association of North America (AIA/NA) (1975 to 1980)
- The Brake Lining Manufacturing Association (from an unknown period to 1949)
- Friction Materials Standards Institute (1949 to 1994)
- The Air Hygiene Foundation of America (1937) (subsequently known as the Industrial Hygiene Foundation)
- The Industrial Hygiene Foundation (1946)
- The American Industrial Hygiene Association ("AIHA")
- The Air Pollution Control Association
- The Manufacturers Alliance for Productivity and Innovation (formerly the Machinery and Allied Products Institute).

See also objections and response to Interrogatory No. 8, above.

INTERROGATORY NO. 31:

State in detail what test, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust, fibers or particles to which workers were exposed while using, working with and/or around, installing and/or applying your asbestos-containing products.