contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents will be made available through Abex counsel at a mutually convenient time and at a location conducive to production.

(d) Asbestos-containing automotive brake lining, manufactured by Abex were shaped into curved, linear segments in such dimensions as required by the specifications, characteristics and uses established by the manufacturer of the vehicle or the equipment on which the lining was applied.

(e) Abex friction products specifically, its brake linings, are generally designed to assist in the stopping or control of a moving object.

(f) Asbestos-containing automotive friction products manufactured and sold by Abex were generally packaged in cardboard boxes according to size. The brand name appeared on the package as did the product name. Abex further states that 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 reads 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