

operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all of the records and documents that might be responsive to this interrogatory.

Subject to and without waiving these objections, and insofar as Abex understands this interrogatory, in the mid-1970s, 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 does not believe the wording of this warning was ever changed. To the best of current and reasonably available information and belief, the warning labels were affixed to automotive friction product packages.

In 1979 and 1982, Abex 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." An excerpt of this pamphlet is reprinted below:

**RECOMMENDED PROCEDURES FOR REDUCING
ASBESTOS DUST DURING BRAKE SERVICING**

Because studies have indicated that exposure to excessive amounts of asbestos dust may be a potential health hazard, OSHA has set maximum levels to which workers may be exposed. Since most automotive friction materials normally contain a sizable amount of asbestos, it is important that people who handle brake linings and clutch facings understand the nature of the problem and know the precautions to be taken.

- 1) Areas where brake work is done should be set aside if possible, and entrances should be posted with an asbestos exposure sign as follows:

**ASBESTOS DUST HAZARD
AVOID BREATHING DUST**