

ANSWER TO INTERROGATORY NO. 27: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, assumes facts not established, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further states that, if properly used, its asbestos-containing automotive friction products do not contribute to or cause a health hazard.

28. When, if at all, did you first become aware that airborne dust containing some asbestos fibers might be created in the course of the use of your asbestos products by workers in:

- (a) the pipe insulating trade;
- (b) textile factories;
- (c) companies manufacturing asbestos products;
- (d) other industries such as but not limited to:
 - (1) railroads
 - (2) oil burner service

ANSWER TO INTERROGATORY NO. 28: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, assumes facts not established, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further states that, if properly used, its asbestos-containing automotive friction products do not contribute to or cause a health hazard.

29. When did you first become aware that airborne dust containing asbestos fibers or fibrils would be created in use or removal of your asbestos products by an insulation worker or other workers could cause asbestosis, pleural thickening or pleural plaque, mesothelioma, or lung cancer? Please identify the date of this knowledge by product whether raw asbestos or a finished product and the date of knowledge that each of the diseases set out could develop from exposure to asbestos.