(c) The date(s) and manner in which said material was distributed to purchasers or users of your product(s);

(d) Identify and produce all applicable documents.

ANSWER TO INTERROGATORY NO. 22: 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."

23. If there have been any changes in any labels, inserts or other information which has ever accompanied any of your products as it was placed on the market, state the reasons therefore and the name and address of the person who recommended or ordered the change.

ANSWER TO INTERROGATORY NO. 23: Abex is not aware of any such changes having been made.

24. State the names, titles and addresses of defendant's advertising agents who are employed or used in connection with the promotion of the product(s) specified in answer to interrogatory 6, and give a summary of all the instructions given to such agents regarding the uses, safety, and health-related effects of the use of the products and their obligations to provide this information to customers.

ANSWER TO INTERROGATORY NO. 24: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, Abex does not know with certainty each material which was used to promote or advertise its asbestos-containing friction products. Documents generally meeting the description of promotional and advertisements materials are on file and can be made available