

established. Subject to and without waiving these objections, Abex maintains that proper use of its products does not present a health hazard.

3. Have you ever conducted any inspection or made any dust count of areas at plaintiff's place of employment or at any other facilities where workers used asbestos products manufactured by your company?

(a) If you have not, explain why this was not done;

(b) If you have, explain what action, if any, was taken by your company following the inspection or the taking of dust counts at plaintiff's place of employment or other facility. Also please give the dates and places, if any, that your company made such dust counts, and set forth the names and addresses of the persons who made, authorized, and received the results of the dust counts.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Subject to and without waiving these objections, since Abex did not have control over jobsites, Abex is not aware that it ever conducted jobsite inspections or dust surveys.

4. State whether from 1930 to the present you have promulgated any rules, written or oral, for the handling of asbestos products by your own employees. If so, state:

(a) When such rules were promulgated;

(b) The substance of the rules, if oral, and the name and title of the person who disseminated them;

(c) If in writing, either attach a copy of the rules or identify the written rules by date, title, identification number, present location and the name and address of the custodian thereof;

(d) Whether any such material was provided to