(a) Defendant provided employer with product specifications concerning the asbestos products sold;

(b) The employer provided product specifications to defendant concerning the asbestos products ordered from defendant;

(c) The defendant provided employer with any advertising or promotional material;

(d) The defendant provided any instructions concerning the proper use of asbestos materials;

(e) The defendant provided warnings regarding the asbestos products sold or delivered;

(f) The defendant provided any warranties concerning the asbestos products delivered;

(g) The defendant expressly disclaimed any warranties concerning the asbestos products delivered.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and assumes facts not yet established. See answer to interrogatory No. 17.

19. If any part of the interrogatory above is answered in the affirmative:

(a) Describe each document in detail;

(b) Identify each such document by date, title and identification number;

(c) Indicate the name, address and job title of the person who prepared it;

(d) Indicate the name, address and job title of the person who authorized its use;

(e) Indicate the means of transmission of each;

(f) Attach copies of all of same hereto.