

ambiguous.

22. Does the defendant have in its possession any books, pamphlets, memoranda or written materials of any kind or character written before 1970, which would indicate that asbestos fibres when inhaled can be dangerous to the health of human beings? If so, please set forth for each such publication:

(a) The name of each such publication, document or written material;

(b) The date each such document, memoranda or written material was published and the name of the publisher and author;

(c) The date defendant first acquired knowledge of each such publication;

(d) The name, job title and address of each person who currently has possession of such documents.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects to this interrogatory on the grounds that, since asbestos in Abex products was resin-bonded and encapsulated, any information Abex may have possessed concerning raw asbestos fibers is irrelevant and not calculated to lead to the discovery of admissible evidence.

23. Set forth, in detail, all knowledge defendant had (giving date knowledge was obtained in each instance and the name and address of the person who obtained such knowledge) with regard to jobs, work area and general environment of plaintiff, including:

(a) The materials used and the names of the manufacturers or suppliers;

(b) Amount of asbestos friction materials used;