

asbestos;

- (c) The vendor of the asbestos fibre contained in the product.

ANSWER: Abex objects to this interrogatory on the grounds that it overly broad, burdensome, seeks to violate "trade secrets" and is repetitive. Subject to and without waiving these objections, see Abex's answers to Plaintiff's first set of interrogatories.

59. Please set forth each and every method of affixing defendant's asbestos friction materials to metal shoes or plates from 1938 until the present.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time and scope, burdensome, lacks particularity as to what information is being requested, lacks relevance to this case and is vague and ambiguous.

60. Please state whether defendant is aware of the practice of using compressed air to remove accumulated dust and debris from brake drums or friction mechanisms during brake or clutch maintenance or repair.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time and scope, burdensome and lacks particularity as to what information is being requested, lacks relevance to this case and is vague and ambiguous.