

- (3) Person requesting them;
- (4) All persons known to have received each such article.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Subject to and without these objections, Abex or its corporate predecessors were members of the following trade associations: Asbestos Information Association of North America (1975-1980) and the Brake Lining Manufacturing Association from an unknown date until 1949. Furthermore, Abex is presently a member of The Friction Materials Standards Institute (1949-present); The American Industrial Hygiene Association; The Air Pollution Control Association; the Manufacturers and Allied Products Institute and the American National Standards Institute.

6. State whether defendant or its representatives attended any conferences, symposia [sic] or other meetings concerning the health effects of asbestos exposure, the proper methods of working with asbestos, controlling asbestos dust, setting of standards, regulations, information, lobbying, research, engineering, or use of asbestos products, materials or fibres. If so, state or identify:

- (a) The person or organization that sponsored it;
- (b) The date and place it was held;
- (c) Your personnel who attended it;
- (d) All information provided there concerning the health consequences of asbestos exposure, the proper methods of working with asbestos, or methods of controlling asbestos dust;
- (e) Produce all writings distributed at or