

- (1) A verbatim statement of any warnings or cautions;
- (2) The date(s) each such warning or caution was first used and last used;
- (3) Identify and produce a copy of said warning or caution.

ANSWER TO INTERROGATORY NO. 19: Abex objects to this interrogatory on the grounds that it is overly broad as to time and scope. Subject to and without waiving this objection, all asbestos-containing automotive friction products manufactured and sold by Abex were generally packaged in cardboard boxes according to size. The brand name of the product would appear on the package, as did the company name.

In the mid-1970's, and perhaps earlier, Abex commenced the placement of warning labels on all packages of its asbestos-containing automotive friction products. This label read as follows:

Caution
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause Serious
Bodily Harm

20. Prior to releasing the asbestos product(s) listed in interrogatory 6 for sale, were any tests conducted on same to determine potential health hazards involved in the use, handling or exposure of the materials contained therein: If so, state:

- (a) The identity of each individual or firm who conducted such tests;
- (b) The date, purpose and result of each such test;
- (c) Identify and produce all documents relating to such tests.