

(c) The date same was prepared;

(d) The media used to disseminate the sales material.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, Abex does not know with certainty each material which was used to promote or advertise its asbestos-containing friction products. Documents generally meeting the description of promotional and advertisements materials are on file and can be made available for inspection and copying upon receipt of an appropriate document request.

38. Has any written material of any kind or character been prepared by Defendant, Defendant's predecessor or any of Defendant's subsidiary companies or their agents indicating how the asbestos-containing brake lining products listed in response to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories should be used or maintained by the person installing it or applying it to an automobile? If so, please state the following:

(a) The name, address and job classification of each person who prepared same;

(b) The name, address and job classification of each person who presently has possession of same;

(c) The dates and manner in which said material was distributed to purchasers of the products in answer to Interrogatory No. 5.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects on the grounds that, in seeking information concerning products to which the plaintiff does not allege her decedent was exposed, this interrogatory lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, Abex did not provide any