

- (a) Identify each such association or organization;
- (b) The dates during which you were a member;
- (c) The names of any publication published by or written by such association or organization;
- (d) The dates and addresses of all other members;
- (e) What meetings you attended and identify who attended;
- (f) Who spoke at such meetings;
- (g) Were transcripts or summaries or minutes or notes made of such meetings? If so, identify the above, tell specifically what was made and give the name, title and address of the person or persons who have custody of the transcripts and/or summaries and or minutes and/or notes mentioned above and state when and where counsel for the plaintiff may examine and copy these documents.

ANSWER TO INTERROGATORY NO. 34: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad as to time and scope. Subject to and without waiving these objections, Abex was a member of the following trade associations: Asbestos Information Association of North America (1975 to 1980) and The Brake Lining Manufacturing Association (from an unknown period to 1949). Furthermore, Abex was a member of the Friction Materials Standards Institute (1949 to present); The American Industrial Hygiene Association ("AIHA"); The Air Pollution Control Association; the Manufacturers Alliance for Productivity and Innovation (formerly the Machinery and Allied Products Institute).

Abex is aware that some of its employees attended some meetings of the Industrial Hygiene Foundation ("IHF"), however,