

provide protection from dust, indicate exactly which dust or dusts, and why defendant wanted to provide protection from dust or reduce the dust level.

ANSWER: Abex objects to this interrogatory on the grounds, that it is burdensome, overly broad, and, because it seeks information regarding Abex employees, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

37. If your company contends that there was no satisfactory substitute for friction products containing asbestos prior to 1973 state each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: Abex objects to this interrogatory on the grounds that contention interrogatories to defendants are premature. Abex also objects to this interrogatory on the grounds that it is overly broad, burdensome, assumes facts not established, and lacks particularity as to what information is being requested. Abex further objects on the grounds that "satisfactory substitute for friction products containing asbestos" is not defined and Abex cannot answer this interrogatory absent such definition.

38. If your company contends that there was no satisfactory substitute for friction products containing asbestos prior to 1973 state each and every fact which supports that contention, and the names and addresses of persons with any knowledge.