

Subject to and without waiving these objections, any quality control systems would have ensured that Abex's asbestos-containing automotive friction products would perform their intended task, i.e. slowing or stopping a moving vehicle. Any of these products which did not meet performance specifications, would not have been sold.

18. State whether any such asbestos products were rejected during the inspection process. If so, state what the reasons were for any such rejection.

ANSWER TO INTERROGATORY NO. 18: See answer to interrogatory No. 17.

19. State whether the asbestos products listed in Answer No. 7, or made available to or sold to any defendant, were the subject of any type of advertisement, regardless of media, issued on behalf of your company since 1939. If so, state for each product:

- a. The subject matter of the advertisement.
- b. The media in which the advertisement was placed.
- c. When the advertisement was so placed.
- d. The geographic areas the advertisement was used in.
- e. Whether any photographs or diagrams were included in the copy of the advertisement.
- f. Identify the advertisement by author, date, and present location and custodian, attach copies of all advertisements and state exactly where the advertisement was published, broadcast or made public; and
- g. Was anyone, beside you, involved in the preparation of the copy for the advertisement, and if so, state such other name and address.

ANSWER TO INTERROGATORY NO. 19: Abex objects to this interrogatory on the grounds that it is overly broad and