

prevent release of airborne asbestos fibers in excess of the exposure limits.

CAUTION: DO NOT BREATHE ASBESTOS DUST

20. When was the first time you received notice that any person, including any of your employees, was claiming an injury as the result of using any asbestos-containing products manufactured and/or sold by your company?

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden
2. Overly Broad
3. Lack of Particularity

21. For each such injury described in the preceding interrogatory that you received notice of or a claim for prior to 1972, please list:

- (a) The name and address of each claimant.
- (b) The date of notice of each claim.
- (c) A description of the claim, i.e., workmen's compensation, or a third party liability action.
- (d) The type of injuries allegedly sustained.
- (e) The name and address of each attorney who represents individuals making such claims.
- (f) The style and court number of each claim.
- (g) The resolution of each claim that has been settled or taken to judgment.
- (h) The custodian of the records that relate to the claim.