

5. For each product identified in answer to Interrogatory 1 state whether you engaged in any advertising program to promote the sale of that product and, if so, state:

(a) The name or description of each advertising media that you have used to promote the product during the period 1936 to 1980;

(b) The name of each national magazine or periodical in which you have advertised the product during the period 1936 through 1980;

(c) The date of each issue of such magazine or periodical in which such advertisement appeared;

(d) The name and address of each newspaper in which it advertised the product during the period 1936 through 1980;

(e) The date of each publication of each newspaper in which the advertisement appeared;

(f) Identify and produce each document which refers, reflects or pertains to each such advertisement which was published in each such magazine, periodical and/or newspaper;

(g) State whether the advertising of the product was handled by an agency and, if so, state the name and address of each advertising agency that handled any portion of the advertising of the product during the period 1936 through 1980.

ANSWER TO INTERROGATORY NO. 5: 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 publication, if any, in which Abex may have advertised any of its asbestos-containing automotive friction products. Documents generally meeting the description of advertising and promotional materials are on file and can be made available for inspection and copying upon receipt of an appropriate document request.

6. For each product identified in answer to Interrogatory 1 which was distributed to a company that used said products in Delaware or was a distributor of said products for an area including Delaware, state:

(a) The name and address of the company;