

to delete the asbestos, and the date the product was first produced without the asbestos;

- (i) If the product is no longer produced, all reasons it was discontinued, the identity of the person(s) who made the decision to discontinue the product, the brand name of the replacement product, and the date the replacement product first went into production; and
- (j) The reasons why asbestos was used as an ingredient in each such product.

RESPONSE TO INTERROGATORY NO. 37:

See General Objections. Abex further objects to this request on the grounds that it is duplicative, compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the grounds that it seeks or makes inquiry into confidential, proprietary or trade secret information or materials.

Without waiver of these objections, Abex responds that Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile, only. Abex's asbestos-containing automotive friction products were not manufactured pursuant to any single formula. Any variations in the formulas of Abex's asbestos-containing automotive friction products were made to meet specifications, characteristics and uses established by the manufacturer of the vehicle or equipment on which the product would have been applied.

*bought
from
NAAC*

Abex ceased producing asbestos-containing automotive friction products in 1987 due to a shift in the demand of the automotive friction products market.

See also Abex's response to Interrogatory Nos. 19 and 25, above.

INTERROGATORY NO. 38: