asbestos Abex ever used for product production, which was resin-bonded and encapsulated, proper use of such products did not create or contribute to any adverse health effects

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Abex discontinued the manufacture and sale of asbestos-containing friction products in 1987 and no longer operates any friction product manufacturing facilities There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all the records and documents that might be responsive to this interrogatory.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, Abex is unaware of when it was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust. Lloyd Hamlin served as Abex's Medical Director from 1941 to 1961. Dr. Hamlin published an article in 1955, referring therein to maximum allowable concentrations for various substances. Dr. Hamlin is deceased and Abex has no way to determine when, if ever, he or any other Abex official first received information responsive to this interrogatory.

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