instructions with its asbestos-containing automotive friction products.

39. Does Defendant contend that the asbestos-containing brake lining products can be manufactured so as to eliminate all potential health hazards to workers installing same? If so, please state the following:

(a) The date that Defendant first determined that another product could be used in place of asbestos;

(b) The chemical of the substitute;

(c) Whether the substitute is suitable for the purpose for which they are to be used;

(d) Whether Defendant used the substitute for asbestos to 1971;

(e) Whether Defendant ever used the substitute for asbestos for high or low heat insulation.

ANSWER: Abex objects to this interrogatory on the grounds that it is premature. Abex has not yet determined which contentions it intends to interpose at a trial of this matter and reserves the right to supplement this answer once such a determination has been made.

40. Did Defendant receive notice prior to 1968 that any person was claiming injury as a result of using asbestos-containing brake lining products manufactured and/or sold by Defendant? If so, please state:

(a) The name and address of each claimant;

(b) The date of notice of each claim;

(c) A description of the claim;

(d) The type of injuries allegedly sustained;

(e) The name and address of each attorney representing the individuals making such claims;

(f) The style and court number of each such claim;