

52. Please state whether any of the distributors of your asbestos containing friction products were provided with any special instructions, oral or written, in regard to utilizing said products in a manner so as to avoid exposing workers to amounts of dust exceeding the MAC or TLV. If so, please state:

- (a) When these instructions were given.
- (b) By whom these instructions were given.
- (c) Were the instructions oral or written.
- (d) The precise content of the instructions.
- (e) If the instructions were written, please attach a copy to the instructions.

ANSWER: Abex objects to this Interrogatory on the grounds that it is overly broad. Without waiving this objection, see Response to Interrogatory No. 19.

53. Please state whether any employee of the defendant has ever made a claim for asbestosis under the Occupational Disease or Workmen's Compensation Statute of any state. If so, please state the date that the defendant first received notice of any claim for asbestosis under the Occupational Disease or Workmen's Compensation Statute of any state and state the total number of claims filed for the years 1930 to 1972.

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

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

Without waiving these objections, Abex states that it is not aware of any Workers' Compensation claims for asbestosis filed during the years 1930 to 1972.