established. Subject to and without waiving these objections, because Abex did not have control over other's jobsites, it is not believed any such tests were conducted.

17. Please state whether or not Defendant ever obtained any knowledge concerning the likelihood of asbestos being hazardous to human health. If so, please state:

(a) When Defendant first became aware of the hazardous potential of asbestos dust and asbestos fibers;

(b) The manner in which the Defendant, Defendant's predecessor, or Defendant's subsidiary companies first obtained this knowledge and became aware of said hazards and from what source this information was obtained.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects on the grounds that this interrogatory fails to distinguish among the different types of raw asbestos fibers, asbestos in building products and asbestos in automotive friction products. To the extent this interrogatory seeks information concerning the working conditions of Abex employees, it is objected to on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, Abex does not know when it first became aware of statements linking prolonged massive exposures to raw asbestos fibers to potential health hazards.

18. Please state when Defendant first became aware of the possible association between inhalation of asbestos dust and/or fibers and the contraction of cancers including, but not limited to gastrointestinal cancer, laryngeal cancer, renal cancer, lymphoma and lung cancer. As to each cancer, state the source of that information, including a description of all tests conducted relative to the possibility of such a relationship.