

(a) From what source or sources, if any, did your company obtain asbestos containing products since 1945.

(b) Whether any warnings, cautions, caveats, or direction accompany the material referred to in (a) and the nature and extent of said warnings, cautions, caveats or directions accompanying said asbestos or asbestos materials.

(c) Approximately what date said warnings, cautions, caveats or directions first appeared on the manufactured asbestos or asbestos materials.

ANSWER: See Response to Interrogatory No. 5. Not Applicable.

31. Has the defendant imported asbestos or asbestos materials since 1930?

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

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

Without waiving these objections, Abex states that it is not engaged in the importation of raw asbestos fiber.

32. If the answer to the preceding interrogatory is in the affirmative, state:

(a) From where the asbestos or asbestos materials was imported.

(b) How long the defendant has imported asbestos or asbestos materials.

(c) Whether the defendant has supplied this imported asbestos or asbestos materials to any of the other