

18. Please describe and identify all tests and experiments conducted by your to determine whether or not asbestos fibers contained within your asbestos containing products would become air-borne upon their application or use by mechanics such as Plaintiff's decedent. Please state the dates of all tests and experiments and the results and conclusions of each test and/or experiment.

ANSWER: Abex objects to this Interrogatory on the grounds that said Interrogatory seeks irrelevant and immaterial information and is not reasonably calculated to lead to the discovery of admissible evidence.

19. State your knowledge as to the manner in which your asbestos containing brake lining products were removed or used by mechanics since 1940 and also state your knowledge as to the manner in which said mechanics using your brake lining products were exposed to or created dust in the form of asbestos air-borne fibers.

ANSWER: See defendant's Answer to plaintiffs' Third Amended Complaint; beyond this answer defendant has no present knowledge as to the information sought in this Interrogatory.