

INTERROGATORY NO. 8.:

Before distributing, selling, or placing the products listed in your responses to Interrogatory Nos. 3-6 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the date of each test.
- B. The name, address, and job title of each person conducting the tests or involved with conducting the tests.
- C. The results of the tests.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Abex further objects to this interrogatory on the grounds that it fails to distinguish among raw asbestos fibers, asbestos contained in building products and asbestos contained in automotive friction products. Proper use of Abex's asbestos-containing automotive friction products did not create or contribute to a health hazard. Abex further objects to this interrogatory on the grounds that it seeks information which has been gathered or prepared in the course of litigation or which is otherwise protected by the attorney-client privilege, the work product doctrine or any other applicable privilege. Subject to and without waiving these objections, Abex was recently provided with an unauthenticated document in the course of litigation which purports to indicate that Abex performed at least one air sampling analysis to collect wear product particles during brake operation prior to November 8, 1971. Neither this document, nor any related documents, have