producing any documents in response to this interrogatory on the grounds that such requests are outside permissible discovery rules. Abex also claims the attorney-client privilege, the work product doctrine, the investigative privilege and the party communication privilege. 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.

40. As to every product of yours which you have identified in previous interrogatories, state specific type or types of asbestos (i.e., crocidolite, chrysotile, amosite or any others) which your products contained. If you have any percentage figures available, then give the percentage as to each product.

ANSWER TO INTERROGATORY NO. 40: Abex objects to this interrogatory on the grounds that it seeks trade secret information. Subject to and without waiving this objection, Abex's asbestos-containing automotive friction products contained approximately 25 to 65 percent chrysotile asbestos only.

41. Set forth a list of photographs, plats, sketches or other documents in your possession that will potentially be used as an exhibit at the trail of this case by you.

ANSWER TO INTERROGATORY NO. 41: Abex objects to this interrogatory on the grounds that it is premature. Abex has not yet determined what evidence it plans to introduce at a trial of this matter. Abex further objects to producing any documents in response to this interrogatory on the grounds that such requests are outside permissible discovery rules.