

SCF-ABEX-0050

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION



NOV 20 1983
BLATT & FALES

GLORIA VAUGHN, ET AL,

Plaintiffs,

vs.

RAYMARK INDUSTRIES, INC.,
ET AL,

Defendants.

No. 82-1655-C(A)



ABEX-001.005

ANSWERS AND OBJECTIONS TO
PLAINTIFFS' INTERROGATORIES PROPOUNDED TO DEFENDANT,
ABEX CORPORATION

Come now Plaintiffs and submit the following Interrogatories to Defendant, Abex Corporation, to be answered in writing and signed under oath, in accordance with the Laws in such cases made and provided:

1. Has Defendant, at any time, engaged in the manufacture of brakelinings and clutches containing asbestos or asbestos fibers, and if your answer is in the affirmative, state:

- a) Where the brake linings or clutches were manufactured.
- b) How long Defendant has manufactured same (give inclusive dates).
- c) Whether Defendant has supplied these brake linings or clutches to any of the other Defendants since 1960, and when these transactions took place, where, and the compensation paid for the manufactured asbestos containing brake linings or clutches.
- d) Whether any warnings, cautions, caveats or directions

20. Please state whether or not you ever obtained any knowledge concerning the likelihood of asbestos inhalation being hazardous to health, and if so, state when the corporation first became aware of the hazardous potential of asbestos and its products. State how the Defendant first obtained this knowledge and became so aware of said hazards and from what source this information was obtained.

ANSWER: Knowledge of potential asbestos hazards from industrial type processing of asbestos was basic to the Abex Occupational Health Program since 1941, upon formation of the Medical Department. See Response to Interrogatory No. 13.

21. Please state the date when you first notified mechanics engaged in the application or removal of asbestos containing brake linings as to the need to wear respirators.

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. Further, Abex objects on the grounds that said Interrogatory assumes certain facts not presently in evidence.

22. State whether Defendant has ever published and/or distributed any brochures, sales literature, pamphlets, bulletins, or other written materials (aside from any caution labels on containers) of any kind or character that contained any warnings, cautions,