

- (a) The date of each such warning.
- (b) How such warnings were given;
- (c) If such warnings were oral, state the names and addresses of the person(s) giving and receiving such warnings;
- (d) If such warnings were written, state:
 - (1) The date(s) of such warning(s);
 - (2) The present location of such warning(s);
 - (3) The names and addresses of individuals who prepared such warning(s);
 - (4) Where and/or how such warning(s) were posted;
 - (5) The reasons for such warning(s).
- (e) Whether or not in the course of such warnings, there was any warning concerning the possibility of contracting the disease known as cancer resulting from the use of or exposure to the asbestos products. In particular, whether there was any warning concerning that type of cancer known as mesothelioma.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

27. Were you ever advised by any member of the medical profession or other profession such as industrial hygienists, occupational hazard professionals or other persons to utilize hazard labels on your products and to give clear and explicit warnings concerning the possibility of cancer, and/or mesothelioma and/or other serious illnesses and diseases including but not limited to asbestos to those who might use, handle, or be exposed to your asbestos products after they have left your control? Identify this individual or individuals or company set forth the date of this advise, and attach copies of this advise if written.