

4. Lack of Relevance

62. If the answer to Interrogatory 61 is in the affirmative, state:

(a) The date and place of such meeting, seminar, conference, or convention where the subject of occupational health and exposure to asbestos was discussed.

(b) The name of address of the speaker(s) or discussant(s).

ANSWER: See Response to Interrogatory No. 61.

63. Did the defendant ever warn any labor union representing workers of any potential health hazard from use of products containing asbestos?

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden
2. Overly Broad

Without waiving these objections, Abex states that such warning information would have been reflected in the warning labels placed by Abex on all asbestos-containing friction materials since 1972. Abex further states that since 1964, it has distributed a document entitled, "Recommended Procedure for Reducing Asbestos Dust During Brake Servicing", prepared by the Friction Materials Standards Institute, Inc., as well as a brochure prepared by the Friction Materials Standards Institute, entitled, "Friction Materials Work Practices Guide." Such documents are on file and can be made available for inspection