

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome, vague, ambiguous and overly broad as to scope in that the word "tests" is not limited to dealing with asbestos dust which might be released from Abex's products. To the extent that this interrogatory is requesting information concerning asbestos dust which might be released from Abex's products, Abex is unaware of any such tests being conducted. Discovery is continuing in this matter and Abex expressly reserves the right to supplement this answer should further information become available.

21. Did you make any changes in your asbestos products as a result of such test: If so, state:

- (a) The product changes;
- (b) The nature of the change made;
- (c) The purposes of the change;
- (d) The date of such change;
- (e) The identity of each person or firm responsible for making the change.

ANSWER: See answer to interrogatory No. 18.

22. Has any written material of any kind been prepared by you indicating how your product(s) should be used, applied or handled by the workers who would be reasonably expected to your asbestos products? If so, please state:

- (a) Identify each person or firm who prepared same;
- (b) Identify each person or firm who presently has possession of same;