

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,