RESPONSE TO INTERROGATORY NO. 5 SUBPART (b)(5):

Friction products are generally designed to assist in the stopping or control of a moving object.

RESPONSE TO INTERROGATORY NO. 5 SUBPART (b)(6):

Asbestos-containing automotive friction products manufactured and sold by Abex were generally packaged in cardboard boxes according to size. The brand name appeared on the package as did the product name.

Abex responds that in the mid-1970's, and perhaps earlier, Abex commenced the placement of warning labels on its asbestos-containing automotive friction products. This label read as follows:

Caution
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause Serious
Bodily Harm

Abex does not believe the wording of this warning was ever changed.

RESPONSE TO INTERROGATORY NO. 5 SUBPARTS (b)(7) AND (b)(8):

Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile, only.

RESPONSE TO INTERROGATORY NO. 5 SUBPART (c):

Abex further objects to this subpart on the ground that it is repetitive.

Subject to and without waiving this additional objection, see objections and response to Interrogatory No. 5 Subpart (b)(3), above.