

29. If Defendant ever gave any warnings regarding its asbestos-containing products, please state:

(a) On what date did your company, or your predecessor(s), issue an order directing a warning to be placed on your asbestos-containing products, or containers and/or in sales literature;

(b) On what date was such warning actually first placed on your asbestos-containing products, containers or sales literature;

(c) on what date did your asbestos-containing products accompanied by such warning, first reach the insulation contractor?

(d) State the exact wording of the first warning.

(e) State the exact size of the warning printed on your asbestos insulation products, containers and/or in sales literature;

(f) Did your company, or its predecessor(s), dictate the exact size of the printed warning?

(g) Why did your company or its predecessor(s) place such warning on your asbestos-containing products, containers and/or sales literature?

(h) Did your company or its predecessor(s) place such warning on your asbestos-containing products, containers and/or sales literature because your received a directive, command, suggestions, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute? If so, from whom and on what date did you receive such directive, command, suggestion,, legal opinion or other type of communication.

(i) If the wording of the warning has ever been changed or altered, state when it was changed, and the exact change in the wording.

ANSWER TO INTERROGATORY NO. 29: Abex never manufactured and sold any asbestos-containing building products. Abex also claims the attorney-client privilege and the attorney work product doctrine. Subject to and without waiving these objections, in 1972, at the latest, Abex commenced the placement of warning labels on packages of 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