3. Lack of Relevance

87. Please state the date when you first notified mechanics engaged in the application or removal of your asbestos containing brake lining products as to the need to wear respirators.

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

1. Burden

2. Overly Broad

3. Improper Assumption

Without waiving these objections, Abex states that in 1972, it commenced the placement of warning labels on all packages of asbestos-containing friction materials manufactured and sold by it.

88. State whether or not defendant has ever published bulletins, warning its employees concerning the hazards of inhaling asbestos and coming into contact with the products of this defendant containing asbestos. If so, please attach copies of bulletins issued by the defendant to its employees on said subject, stating the date and year that said bulletins were distributed to your employees and the name of the author of said bulletin in the employ of the defendant.

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

1. Burden

2. Overly Broad

3. Lack of Relevance