

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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ALBERT DiSANTIS, et ux., :
Plaintiffs, : No. 87-0515
v. :
ABEX CORPORATION, et al., :
Defendants. :

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ABEX CORPORATION'S ANSWERS
TO SET 2 OF INTERROGATORIES
PROPOUNDED BY PLAINTIFFS

INTRODUCTION AND GENERAL OBJECTIONS

Abex Corporation ("Abex"), by and through its attorney of record, Clayton H. Thomas, Jr., generally objects to these interrogatories on the grounds that they are unduly burdensome, oppressive, vague, overly broad as to time, scope and location, lack particularity, and are repetitive. Objection is also made to the extent these interrogatories assume the truth of matters not established, and on the grounds that they seek information which is not relevant to the subject matter of this lawsuit and not reasonably calculated to lead to the discovery of admissible evidence.



Abex further objects to these interrogatories to the extent that they seek privileged information, proprietary information or other information or materials which have been gathered or prepared in the course of the asbestos litigation, or which is otherwise subject to the attorney-client privilege, the attorney work-product privilege, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Abex objects to these interrogatories to the extent that they seek confidential, proprietary or "trade secret" information or materials and upon the further ground that they seek documents or information not relevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence.

Abex objects to these interrogatories on the ground that they seek information from and identification of each and every person with knowledge of a particular fact, event or subject matter and as such these interrogatories are overly broad, unduly burdensome, oppressive and harassing. The interrogatories are complex and vague and have overlapping subject matters.

The answers of Abex hereinafter set forth are limited to providing information concerning domestic friction products manufactured by Abex only. Abex has never mined asbestos, nor has Abex manufactured, processed, distributed, marketed or sold

any thermal insulation or acoustical products containing asbestos.

The information provided in these answers to interrogatories is based upon such information as is presently available to Abex, and Abex expressly reserves the right to supplement or amend these answers when and if additional relevant information or documentation is discovered. Some information provided herein is based upon knowledge obtained through a review of Abex's documents and records. This review is continuing. Abex does not concede that any of its answers to these interrogatories are or will be admissible evidence at a trial of this action, and Abex does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answer at trial.

To the extent that the information contained herein differs in any respect from any prior answer to discovery, these answers shall be deemed to update and supersede any prior answers in any and all actions. This introduction and the general objections are explicitly incorporated into each of the answers set forth herein.

Subject to the preceding objections, the basis for the following answers having been thus established, Abex answers as follows:

SPECIFIC RESPONSES

1. Is it possible to distinguish the asbestos products listed by you in your answer to interrogatory #6 of Plaintiff's First Set of Interrogatories from those manufactured by competitors?

(a) If the answer is anyway in the affirmative, please describe how you contend your product can be distinguished, both as a new product, and as one which is removed after use. Also describe how the products by trade and generic name are distinguishable, and the years in which they can be distinguished.

(b) If there are products which cannot be, in your opinion, distinguished from products of a similar kind manufactured by a competitor, please state the name of such product, who manufactures it, as well as the trade name of the product manufactured by your competitor and the years in which they cannot be distinguished.

ANSWER: Abex objects to this interrogatory on the grounds that it is unduly burdensome and overly broad in that it requests information concerning the products of entities other than Abex.

2. When did you first learn that there were or might be adverse health effects associated with the use and fabrication and/or manufacturing, cutting, splicing, removal, installation or rip-out or tear-out of asbestos containing products; state the date, source, nature and extent of such information.

(a) When and how did you learn that, in the use of your asbestos containing products, they would emit asbestos dust into the air?

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, lacks particularity as to what information is being requested and assumes facts not yet

established. Subject to and without waiving these objections, Abex maintains that proper use of its products does not present a health hazard.

3. Have you ever conducted any inspection or made any dust count of areas at plaintiff's place of employment or at any other facilities where workers used asbestos products manufactured by your company?

(a) If you have not, explain why this was not done;

(b) If you have, explain what action, if any, was taken by your company following the inspection or the taking of dust counts at plaintiff's place of employment or other facility. Also please give the dates and places, if any, that your company made such dust counts, and set forth the names and addresses of the persons who made, authorized, and received the results of the dust counts.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Subject to and without waiving these objections, since Abex did not have control over jobsites, Abex is not aware that it ever conducted jobsite inspections or dust surveys.

4. State whether from 1930 to the present you have promulgated any rules, written or oral, for the handling of asbestos products by your own employees. If so, state:

(a) When such rules were promulgated;

(b) The substance of the rules, if oral, and the name and title of the person who disseminated them;

(c) If in writing, either attach a copy of the rules or identify the written rules by date, title, identification number, present location and the name and address of the custodian thereof;

(d) Whether any such material was provided to

plaintiff's employer or any other defendant, and, if so, when and to whom.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time, scope and location and is burdensome. Because this action relates to alleged users of Abex's finished products, the interrogatory also lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

5. State the names, and addresses of all professional, industrial, health and safety organizations to which you have belonged which have anything to do with the health effects of asbestos, the proper methods of working with asbestos, methods of controlling asbestos dust, setting of standards or regulations, information, lobbying, research, engineering, or use of asbestos products, materials, or fibres, stating the inclusive dates of such membership and the names and addresses of defendant's representatives attended the meetings.

(a) Were you at any time a member of the Industrial Hygiene Foundation?

(b) If the answer to 5a is yes, during what years?

(c) Did you receive the monthly digest of the IHF during the period of your membership?

(d) Did you ever request articles listed in the IHF digest?

(e) If the answer to 5d is yes, please list the date of all such requests and the article(s) requested.

(f) Did you ever request articles on asbestos from the IHF?

(g) If the answer to 5(f) is yes, please list:

(1) All articles requested;

(2) Date of request;

- (3) Person requesting them;
- (4) All persons known to have received each such article.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Subject to and without these objections, Abex or its corporate predecessors were members of the following trade associations: Asbestos Information Association of North America (1975-1980) and the Brake Lining Manufacturing Association from an unknown date until 1949. Furthermore, Abex is presently a member of The Friction Materials Standards Institute (1949-present); The American Industrial Hygiene Association; The Air Pollution Control Association; the Manufacturers and Allied Products Institute and the American National Standards Institute.

6. State whether defendant or its representatives attended any conferences, symposia [sic] or other meetings concerning the health effects of asbestos exposure, the proper methods of working with asbestos, controlling asbestos dust, setting of standards, regulations, information, lobbying, research, engineering, or use of asbestos products, materials or fibres. If so, state or identify:

- (a) The person or organization that sponsored it;
- (b) The date and place it was held;
- (c) Your personnel who attended it;
- (d) All information provided there concerning the health consequences of asbestos exposure, the proper methods of working with asbestos, or methods of controlling asbestos dust;
- (e) Produce all writings distributed at or

concerning the conference, symposium or meeting.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome since plaintiff does not define what he means by the terms "symposium," "conference" or "meeting." Subject to and without waiving these objections, Abex does not believe any of its representatives or employees attended any meetings, conferences or symposiums concerning the use, regulations, alleged potential health effects or other aspects of asbestos.

7. Do you maintain a library dealing with disease, industrial hygiene, medicine, safety or engineering related to asbestos? If so, state:

- (a) The date you established the library;
- (b) The location of the library;
- (c) The name of the librarian(s) since 1930;
- (d) All journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety or engineering;
- (e) The date(s) such journals were acquired;
- (f) All books and articles dealing with asbestos and asbestos related diseases and the date acquired;
- (g) The name(s) and position(s) of those for whom the library was established;
- (h) If no library was established, explain why.

ANSWER: Abex objects to this interrogatory on the grounds, that it is burdensome, overly broad, lacks relevance

to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the medical department of Abex may have certain publications mentioning the alleged potential health hazards of asbestos; however, it is not believed there was a library or collection of materials specifically relating to asbestos.

8. Have you, at any time since 1940, maintained any office or department dealing with medical or scientific research? If so, state:

- (a) The name of such department;
- (b) The location of such department;
- (c) The name, address, and title of each person who has been in charge of the department.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time, scope and locations, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the grounds that "dealing with medical or scientific research" is not defined and is therefore vague and ambiguous. Subject to and without waiving these objections, Abex has maintained a medical department since approximately 1941.

9. Has defendant hired a "medical director"? If so, state:

- (a) The reason for hiring such a medical

director;

(b) The location where the medical director was assigned;

(c) The duties of the medical director;

(d) The names and addresses of the persons hiring such medical director and of the medical director;

(e) Whether such medical director ever made recommendations with regard to minimizing, eliminating, or controlling asbestos dust exposure to your own workers or the workers exposed to your asbestos products, and if so, what were the recommendations;

(f) The date defendant first hired a medical director;

(g) The person(s) to whom the medical director reported;

(h) If no medical director was hired, please explain why.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time, scope and locations, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, Abex has employed the following persons as medical director.

Lloyd E. Hamlin	1941-1961
Charles C. Blackwell, Jr.	1961-1976
Frederich W. Knoch	1976-1982
William F. Redman	1982
Dennis G. Egnatiz	1983-1987

Abex is currently without a medical director.

10. Has defendant hired anyone in a medical advisory capacity? If so, please state:

- (a) The reason for hiring a medical advisor;
- (b) The location where the medical advisor was assigned;
- (c) The duties of the medical advisor;
- (d) The names and addresses of the persons hiring such medical advisor and of the medical advisor;
- (e) Whether such medical advisor ever made recommendations with regard to minimizing, eliminating, or controlling asbestos dust exposure to your own workers or the workers exposed to your asbestos products, if so, what were the recommendations;
- (f) The date defendant first hired a medical advisor;
- (g) The person(s) to whom the medical advisor reported;
- (h) If no such person was hired, explain why.

ANSWER: See answer to interrogatory No. 8.

11. Has defendant ever hired an industrial hygienist, safety director or an occupational health advisor? If so, please state:

- (a) The reason for hiring such an individual;
- (b) The location where the individual was assigned;
- (c) The duties of the individual;
- (d) The names and addresses of the persons hiring such individual and of the individual;
- (e) Whether such individual ever made recommendations with regard to minimizing, eliminating, or controlling asbestos dust exposure to your own workers or the workers exposed to your asbestos products, and if so, what were the recommendations;
- (f) The date defendant first hired such individuals;

(g) The person(s) to whom the individual director reported;

(h) If no such individual was hired, please explain why.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

12. If any of your employees or officers have testified at trial or by deposition in any litigation or before any Congressional Committee or administrative agency, published any articles, or made any written statements concerning asbestos exposure, pulmonary or asbestos related diseases or industrial hygiene relating to asbestos use, state:

(a) The name, address and title of each person;

(b) The date, location, and forum of such statement, article or testimony;

(c) Whether defendant has a copy of such statement, article or testimony.

ANSWER: Abex objects to this interrogatory on the grounds it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

13. Have you undertaken to investigate the occurrence alleged in Plaintiff's complaint? If so, state:

(a) The name, address and title of the persons participating in such investigation;

(b) List each written record pertaining to such investigation and its location and custodian;

(c) Whether you have obtained any written statements made by the plaintiff concerning any of the allegations in his complaint.

ANSWER: Abex objects to this interrogatory on the grounds that it seeks information which may have been gathered or prepared in the course of litigation or which is otherwise protected by the attorney-client privilege, the work product doctrine or by any other applicable privilege.

14. Do you contend that the detrimental effects of asbestos to human health differ between asbestos factory workers, miners, millers, insulation workers, and users of friction products? If so, explain in detail each such contention and supply the basis for each such contention.

ANSWER: Abex objects to this interrogatory on the grounds that it seeks a medical or scientific opinion which Abex is not qualified to render. Abex maintains that proper use of its asbestos-containing products does not present a health hazard.

15. Have you ever maintained an outside or independent unit which was responsible for installing, modifying, replacing, reconditioning or repairing asbestos friction products at locations outside of your own manufacturing plant? If so, please state:

- (a) When such units were created;
- (b) Where such units were employed or used;
- (c) Whether you maintained workers compensation insurance on these workers;
- (d) When, if ever, you received notice of an asbestos related disease among such workers;

(e) The names and addresses of the persons who notified you of their asbestos related disease.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, lacks particularity as to what information is being requested and is vague and ambiguous in that "outside or independent unit" is not defined. Abex cannot respond absent such definition.

16. Set forth each and every method, if any, used by defendant to restrict release of asbestos dust, fibres or materials out of the transport containers or from the products themselves, indicating with regard to each such method the time period it was used.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, asbestos contained in Abex products is encapsulated and resin-bonded.

17. Set forth in detail with regard to each and every sale, delivery or supply of an asbestos product to plaintiff's employer the following:

- (a) The date of such sale or delivery;
- (b) The generic name of the asbestos product;
- (c) The brand name of the asbestos product;
- (d) The trademark name of the asbestos product;
- (e) The chemical composition of such asbestos product;
- (f) The quantity of each such sale, delivery or supply, and the price paid by employer for the shipment;
- (g) The invoice and purchase order number of

such shipments and other information required to indentify [sic] each such shipment;

(h) The department and officer or employees of plaintiff's employer who:

- (1) Placed the order;
- (2) Accepted delivery.

(i) The department and officer or employee of defendant who:

- (1) Accepted the order;
- (2) Packaged the order;
- (3) Shipped the order;
- (4) Has possession at the present time of the records concerning such shipment.

ANSWER: Abex objects to this interrogatory on the grounds it is overly broad, unduly burdensome and assumes facts not yet established. Subject to and without waiving these objections, invoices which may or may not indicate sales of asbestos-containing automotive friction products to the plaintiff's employer are on file for a period beginning sometime in 1976 to the present only. Such invoices, which number in excess of 800,000, are arranged for the most part in numerical and chronological order by year and not by customer, product or state. These invoices can be made available for inspection and copying upon receipt of an appropriate document request.

18. With regard to each order of asbestos products sold, delivered or supplied by defendant to plaintiff's employer, state whether:

(a) Defendant provided employer with product specifications concerning the asbestos products sold;

(b) The employer provided product specifications to defendant concerning the asbestos products ordered from defendant;

(c) The defendant provided employer with any advertising or promotional material;

(d) The defendant provided any instructions concerning the proper use of asbestos materials;

(e) The defendant provided warnings regarding the asbestos products sold or delivered;

(f) The defendant provided any warranties concerning the asbestos products delivered;

(g) The defendant expressly disclaimed any warranties concerning the asbestos products delivered.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome and assumes facts not yet established. See answer to interrogatory No. 17.

19. If any part of the interrogatory above is answered in the affirmative:

(a) Describe each document in detail;

(b) Identify each such document by date, title and identification number;

(c) Indicate the name, address and job title of the person who prepared it;

(d) Indicate the name, address and job title of the person who authorized its use;

(e) Indicate the means of transmission of each;

(f) Attach copies of all of same hereto.

ANSWER: See answer to interrogatory No. 18.

20. If any of the information referred to in the interrogatory above was transmitted orally, set forth in detail;

- (a) The substance of each transmission;
- (b) The date of each transmission;
- (c) The name and address and job title of each party who so transmitted same;
- (d) The means of each oral transmission;
- (e) The name, address and job title of the party of employer who received the transmission.

ANSWER: See answer to interrogatory No. 18.

21. If not already supplied in the answers to the preceding interrogatories, with regard to asbestos related disease, protective equipment or the use of asbestos, set forth in detail:

- (a) Any and all information, notices, warnings or advice received prior to 1970 from any and all co-defendants, additional defendants, or workmen's compensation and product liability insurers;
- (b) The date same was received;
- (c) The names and addresses with whom such information, notices, warnings or advice originated;
- (d) The name and the address of the person who received such information, notice, warning or advice;
- (e) If written, attach all copies hereto.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks particularity as to what information is requested and is vague and

ambiguous.

22. Does the defendant have in its possession any books, pamphlets, memoranda or written materials of any kind or character written before 1970, which would indicate that asbestos fibres when inhaled can be dangerous to the health of human beings? If so, please set forth for each such publication:

(a) The name of each such publication, document or written material;

(b) The date each such document, memoranda or written material was published and the name of the publisher and author;

(c) The date defendant first acquired knowledge of each such publication;

(d) The name, job title and address of each person who currently has possession of such documents.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects to this interrogatory on the grounds that, since asbestos in Abex products was resin-bonded and encapsulated, any information Abex may have possessed concerning raw asbestos fibers is irrelevant and not calculated to lead to the discovery of admissible evidence.

23. Set forth, in detail, all knowledge defendant had (giving date knowledge was obtained in each instance and the name and address of the person who obtained such knowledge) with regard to jobs, work area and general environment of plaintiff, including:

(a) The materials used and the names of the manufacturers or suppliers;

(b) Amount of asbestos friction materials used;

ials used; (c) Grade or type of asbestos friction mater-
(d) Environmental conditions;
(e) Threshold limit values of asbestos;
employees; (f) Medical examination and treatment of
used; (g) Health and safety program and procedures
(h) Work practices;
(i) Available protective equipment.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, Abex does not currently possess any information concerning this plaintiff except which may have been gathered during the course of this litigation.

24. Did defendant at any time make any efforts to ascertain the conditions under which their products containing asbestos were used or might be used at the plaintiff's employer's facility? If so, state:

(a) When such efforts were made;
(b) What such efforts revealed;
(c) The individual and his or her job classification who made such efforts;
(d) What defendant did as a result of obtaining such information;
(e) If not, explain why.

ANSWER: See answer to interrogatory No. 3.

25. Has any officer, employee, or representative of defendant visited any automotive repair shop or bus or train or trolley repair shop where its asbestos products were used? If so, state:

(a) The name, address, and title of each employee who visited the shop, and the name of the shop visited;

(b) The purpose of each visit;

(c) The person he or she saw at the shop on each occasion;

(d) Whether such party or parties discussed the effects on health and safety of exposure to asbestos with any personnel at said shop, and if so, state:

(1) The content of such discussions;

(2) The dates of such discussions;

(e) Whether such party or parties attempted to impart information concerning health and safety ramifications of asbestos exposure, and if so, state:

(1) Results of such efforts;

(2) The content of the information sought to be imparted;

(3) The dates of such efforts;

(4) To whom such information was imparted;

(f) Whether reports, memoranda, or notes were prepared as a result of such visits, and if so, attach copies hereto.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects on the grounds that this interrogatory is compound and complex in form

and is vague and ambiguous. Subject to and without waiving these objections, Abex is generally aware that some of its employees may have visited locations where Abex asbestos-containing products were used. Abex cannot specifically state when these visits were made or by whom, and it is believed that these visits occurred solely as a means to enhance Abex's relationship with its customers.

26. Did any representatives of the following direct any correspondence to you?

(a) Any of the automotive repair facilities listed in plaintiff's complaint;

(b) Any other plant or automotive repair shop employing your asbestos products in their operations;

(c) Any of the named defendants or third-party defendants in this action.

ANSWER: (a) Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, any relevant correspondence that Abex may have in this regard is on file and can be made available for inspection and copying upon receipt of an appropriate document request.

(b-c) Abex objects to this interrogatory on the grounds that it is burdensome, overly broad, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

27. If the answer to any of the subparts in the

previous interrogatory is in the affirmative, please indicate whether there is any part of said correspondence which can be classified in any of the following enumerated categories:

(a) Medical policy, practices and procedures, preventive occupational medicine or industrial hygiene;

(b) Asbestos product safety;

(c) Knowledge of actual, alleged or possible health effects associated with exposure to asbestos fibres or products;

(d) Warnings to direct or indirect purchasers, employees, users, employers, and other individuals such as husband or wife plaintiffs concerning the health effects of asbestos, protective equipment to be worn or used when exposed to asbestos, and the proper method for handling asbestos;

(e) Actions taken to protect direct or indirect purchasers, employees, users, employers, and other individuals such as husband or wife plaintiffs from the adverse health effects of asbestos;

(f) Any actions taken to publicize the existence of the adverse health effects of asbestos;

(g) Rebranding of your asbestos fibres or products by others for sale to any of the entities mentioned in interrogatory 26;

(h) Rebranding of asbestos fibres or products or others for sale by you to any of the entities mentioned in interrogatory 26;

(i) Sales of your asbestos fibres or products to any of the entities mentioned in interrogatory 26;

(j) Procedures for the manufacture of asbestos friction materials supplied to any of the entities mentioned in interrogatory 26;

(k) Procedures for which asbestos fibres or products would be used by individuals such as husband-plaintiff;

(l) Communications by you or any trade association of which you were a member with respect to any actual, alleged, or possible health effects associated with exposure to asbestos;

(m) Communications by you or any trade association of which you were a member with respect to actual or proposed standards or regulations concerning the manufacture, processing, use, handling or distribution of asbestos or asbestos products;

(n) Actions taken by you to improve ventilation or dust collection equipment at your asbestos facilities;

(o) Discussions or grievances or complaints filed by any person, employee or union with respect to allegedly unsafe working conditions or the adverse health effects of asbestos;

(p) Discussions or complaints or warnings by any governmental agency with respect to allegedly unsafe working conditions or the adverse health effects of asbestos or violations of safety regulations;

(q) History of asbestos linked illnesses among employees exposed to asbestos;

(r) Workmen's compensation claims, contract unit claims or lawsuits alleging illnesses resulting from exposure to asbestos;

(s) State of medical, scientific and industry knowledge regarding asbestos related disease;

ANSWER: See answer to interrogatory No. 26.

28. If the answer to the above interrogatory is in the affirmative, identify the following:

(a) The name and title of the person authorizing the correspondence;

(b) The date of each correspondence;

(c) Whether or not a copy of the correspondence is presently retained by this defendant or its representatives;

(d) The name and address of the custodian of such correspondence.

ANSWER: See answer to interrogatory No. 27.

29. Did you direct any correspondence to any representatives of the entities mentioned in interrogatory 26?

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, any relevant correspondence that Abex may have in this regard is on file and can be made available for inspection and copying upon receipt of an appropriate document request. See answer to interrogatory No. 26.

30. If the answer to any of the subparts in the previous interrogatory is in the affirmative, please indicate whether there is any part of said correspondence which can be classified in any of the following enumerated categories:

(a) Medical policy, practices and procedures, preventive occupational medicine or industrial hygiene;

(b) Asbestos product safety;

(c) Knowledge of actual, alleged or possible health effects associated with exposure to asbestos fibres or products;

(d) Warnings to direct or indirect purchasers, employees, users, employers, and other individuals such as husband or wife plaintiffs concerning the health effects of asbestos, protective equipment to be worn or used when exposed to asbestos, and the proper method for handling asbestos;

(e) Actions taken to protect direct or indirect purchasers, employees, users, employers, and other individuals such as husband or wife plaintiffs from the adverse health effects of asbestos;

(f) Any actions taken to publicize the existence of the adverse health effects of asbestos;

(g) Rebranding of your asbestos fibres or products by others for sale to any of the entities mentioned in interrogatory 26;

(h) Sales of your asbestos fibres or products to any of the entities mentioned in interrogatory 26;

(i) Procedures for the manufacture of asbestos friction materials supplied to any of the entities mentioned in interrogatory 26;

(j) Procedures for which asbestos fibres or products would be used by individuals such as husband-plaintiff;

(k) Communications by you or any trade association of which you were a member with respect to any actual, alleged, or possible health effects associated with exposure to asbestos;

(l) Communications by you or any trade association of which you were a member with respect to actual or proposed standards or regulations concerning the manufacture, processing, use, handling or distribution of asbestos or asbestos products;

(m) Actions taken by you to improve ventilation or dust collection equipment at your asbestos facilities;

(n) Discussions or grievances or complaints filed by any person, employee or union with respect to allegedly unsafe working conditions or the adverse health effects of asbestos;

(o) Discussions or complaints or warnings by any governmental agency with respect to allegedly unsafe working conditions or the adverse health effects of asbestos or violations of safety regulations;

(p) History of asbestos linked illnesses among employees exposed to asbestos;

(q) Workmen's compensation claims, contract unit claims or lawsuits alleging illnesses resulting from exposure to asbestos;

(r) Workmen's compensation claims, contract unit claims or lawsuits alleging illnesses resulting from exposure to asbestos;

(s) State of medical, scientific and industry knowledge regarding asbestos related disease.

ANSWER: See answer to interrogatory No. 29.

31. If the answer to the above interrogatory is in the affirmative, identify the following:

(a) The name and title of the person authorizing the correspondence;

(b) The date of each correspondence;

(c) Whether or not a copy of the correspondence is presently retained by this defendant or its representatives;

(d) The name and address of the custodian of such correspondence.

ANSWER: See answer to interrogatory No. 30.

32. From 1930 until the present, identify the individual(s) who are or were the most knowledgeable concerning the specific categories which follow, and indicate the period of time over which such person was most knowledgeable. If the most knowledgeable person is deceased or is no longer in your employ, please state his or her name and last known address and also, the name of the most knowledgeable person who is in your employ:

(a) Medical policy, practices and procedures, preventive occupational medicine or industrial hygiene;

(b) Asbestos product safety;

(c) Knowledge of actual, alleged or possible health effects associated with exposure to asbestos fibres or products;

(d) Warnings to direct or indirect purchasers, employees, users, employers, and other individuals such as husband or wife plaintiffs concerning the health effects of asbestos, protective equipment to be worn or used when exposed to asbestos, and the proper method for handling asbestos;

(e) Actions taken to protect direct or indirect purchasers, employees, users, employers, and other individuals such as husband or wife plaintiffs from the adverse health effects of asbestos;

(f) Any actions taken to publicize the existence of the adverse health effects of asbestos;

(g) Rebranding of your asbestos fibres or products by others for sale to any of the entities mentioned in interrogatory 26;

(h) Rebranding of asbestos fibres or products or others for sale by you to any of the entities mentioned in interrogatory 26;

(i) Sales of your asbestos fibres or products to any of the entities mentioned in interrogatory 26;

(j) Procedures for the manufacture of asbestos friction materials supplied to any of the entities mentioned in interrogatory 26;

(k) Procedures for which asbestos fibres or products would be used by individuals such as husband-plaintiff;

(l) Communications by you or any trade association of which you were a member with respect to any actual, alleged, or possible health effects associated with exposure to asbestos;

(m) Communications by you or any trade association of which you were a member with respect to actual or proposed standards or regulations concerning the manufacture, processing, use, handling or distribution of asbestos or asbestos products;

(n) Actions taken by you to improve ventilation or dust collection equipment at your asbestos facilities;

(o) Discussions or grievances or complaints filed by any person, employee or union with respect to allegedly unsafe working conditions or the adverse health effects of asbestos;

(p) Discussions or complaints or warnings by any governmental agency with respect to allegedly unsafe working conditions or the adverse health effects of asbestos or violations of safety regulations;

(q) History of asbestos linked illnesses among employees exposed to asbestos;

(r) Workmen's compensation claims, contract

unit claims or lawsuits alleging illnesses resulting from exposure to asbestos;

(s) State of medical, scientific and industry knowledge regarding asbestos related disease;

(t) Your corporate history;

(u) Your relationship with other corporate entities under your ownership or control;

(v) Location, purpose and operation of your manufacturing facilities.

ANSWER: Abex objects to this interrogatory on the ground it is hopelessly overbroad and unduly burdensome. Abex further objects on the grounds that the majority of these subparts request information irrelevant to this case and information which is not reasonably calculated to lead to the discovery of admissible evidence. Abex also objects on the grounds that "most knowledgeable" is undefined and Abex cannot respond to this interrogatory absent such a definition. There may be many people knowledgeable about different aspects of a particular subject and Abex cannot determine from this interrogatory which "knowledgeable" person should be identified.

33. Did this defendant ever become aware that other companies which sold or supplied asbestos friction or insulation products began to affix precautionary health warning labels to their containers of asbestos fibre or packages of asbestos products? If so, state:

(a) When you first became aware;

(b) Names and addresses of persons who became aware;

(c) Circumstances under which plaintiff became aware;

(d) If your awareness was obtained through a writing, identify the author and date of same, and attach a copy hereto.

ANSWER: Abex objects to this interrogatory on the grounds that it is unduly burdensome and overly broad in that it requests information concerning the products of entities other than Abex. Subject to and without waiving these objections, Abex is not aware if, and, if so, when it first became aware that other companies were affixing warning labels to their packages.

34. Did defendant place warnings on its containers of asbestos fibre or products that were distributed outside of the United States?

(a) If not, explain why, and state the names and addresses of the persons who were responsible for making this decision, and the reason for same;

(b) If so, state:

(1) When defendant first placed such warnings;

(2) State the verbatim content of a warning;

(3) The reason why such warnings were placed in containers or packages.

ANSWER: Abex objects to this interrogatory on the grounds, that it is burdensome, overly broad, lacks relevance to this case and is not reasonably calculated to lead to the

discovery of admissible evidence.

35. If defendant did not place warnings concerning the adverse health effects of asbestos on its containers of asbestos fibre or products which were distributed or sold outside the United States, or said warnings were placed on the containers of asbestos fibres or products subsequent to their placement on containers sold within the United States, please indicate why such warnings were used in the United States but not elsewhere. Also specify:

(a) Each and every country where such warnings were or were not used;

(b) As of what date warnings were used with regard to each country;

(c) The name and address of the person whose decision it was to place or not to place such warnings.

ANSWER: Abex objects to this interrogatory on the grounds, that it is burdensome, overly broad, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

36. Describe in detail the clothing and/or equipment worn by defendant's employees engaged in the manufacturing, production, processing, packaging, assembly, storage or transportation of its asbestos fibre and/or asbestos products. Also please state:

(a) The date such clothing and/or equipment was used;

(b) The names and addresses of the persons who recommended the use of such clothing or equipment;

(c) The name and address of the person whose decision it was to use such clothing or equipment;

(d) State the full and complete purpose of each piece of equipment or clothing;

(e) If the purpose was to reduce dust levels or

provide protection from dust, indicate exactly which dust or dusts, and why defendant wanted to provide protection from dust or reduce the dust level.

ANSWER: Abex objects to this interrogatory on the grounds, that it is burdensome, overly broad, and, because it seeks information regarding Abex employees, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

37. If your company contends that there was no satisfactory substitute for friction products containing asbestos prior to 1973 state each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: Abex objects to this interrogatory on the grounds that contention interrogatories to defendants are premature. Abex also objects to this interrogatory on the grounds that it is overly broad, burdensome, assumes facts not established, and lacks particularity as to what information is being requested. Abex further objects on the grounds that "satisfactory substitute for friction products containing asbestos" is not defined and Abex cannot answer this interrogatory absent such definition.

38. If your company contends that there was no satisfactory substitute for friction products containing asbestos prior to 1973 state each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 37.

39. Is it defendant's contention that while there is a casual relationship between asbestos and disease, illness, or injury suffered by the plaintiff, the asbestos which caused same was not the defendant's? If so, set forth in detail:

(a) The source of the asbestos that caused the injury, illness or disease;

(b) The reasons supporting that conclusion;

(c) Whether defendant ever supplied asbestos products in any form to that source (indicating the dates of such supply);

(d) The names and addresses of persons with any knowledge.

ANSWER: Abex objects to this interrogatory on the grounds that contention interrogatories to defendants are premature. Abex also objects that this interrogatory is vague, ambiguous and incomprehensible in that "casual relationship" is not defined and Abex cannot respond to this interrogatory absent such definition.

40. If defendant contends that plaintiffs improperly used or misused its asbestos fibre and/or friction products, please set forth in detail in what respect the fibre and/or friction products were improperly used, the facts that support that contention, and the names and addresses of persons with any knowledge.

ANSWER: Abex objects to this interrogatory on the grounds that contention interrogatories to defendants are premature. Subject to and without waiving this objection, Abex has not yet had an opportunity to conduct discovery in order to

determine how plaintiff misused asbestos-containing friction products or which other contentions it intends to interpose at a trial of this action. Abex reserves the right to supplement this answer when such a determination has been made.

41. If defendant contends that plaintiff was contributorily negligent while using defendant's fibre and/or friction products please set forth in detail in what respect plaintiff was contributorily negligent, stating each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

42. If defendant contends that plaintiff assumed the risk of injury or illness while using defendant's fibre and/or friction products, please set forth in detail in what respect plaintiff assumed the risk, stating each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

43. If defendant contends that there are other legally responsible persons or entities not named in this lawsuit, please set forth who those persons or entities are and the facts which support that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

44. If defendant contends that any of the entities listed in interrogatory 26 were more knowledgeable than defendant about the dangers associated with exposure to asbestos during the plaintiff's employ at any of the facilities listed in the plaintiff's complaint, please set forth in detail the facts which support that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

45. If the response to the preceding interrogatory is in the affirmative, please set forth why the information which was available to these entities was not also available to defendant.

ANSWER: See answer to interrogatory No. 40.

46. If defendant contends that it was not the proximate cause of plaintiffs' injuries, please set forth in detail what respect it was not the proximate cause of plaintiffs' injuries, each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

47. If defendant contends that plaintiffs' claims are barred by the statute of limitations, please set forth, in detail, each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

48. If defendant contends that service was not properly effected upon it, please set forth the facts which support that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

49. If defendant contends that the various types of asbestos and asbestos products listed in answer to interrogatory #6 of plaintiff's interrogatories to defendant, first set were not

(a) Removed from vehicles which were repaired at any of the facilities listed in plaintiff's complaint as places of employment;

(b) Installed in vehicles which were repaired at any of the facilities listed in plaintiff's complaint as places of employment;

Please set forth in detail the facts which support that contention, as well as the names and addresses of persons who have any information.

ANSWER: See answer to interrogatory No. 40.

50. If defendant contends that this court does not have jurisdiction over the instant matter, please set forth, in detail, the facts that support that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

51. If defendant contends that the "state of the art" of medical and/or scientific knowledge concerning the dangers or adverse health effects of asbestos was such that defendant should not have known of the risks to which it exposed the plaintiffs as a result of contact with its asbestos fibre or asbestos friction or automotive products, please set forth in detail the facts that support that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

52. If defendant contends that it believed that if dust concentrations (of asbestos-containing dust) were kept below 5 million particles per cubic foot, plaintiff and others similarly situated would not contract asbestosis, and in support of this contention will rely upon A Study of Asbestos in the Asbestos Textile Industry, by Dreesen, Dallavale, Edwards, Miller and Sayers, U.S. Treasury Department, Public Health Service, Public Health Bulletin No. 241 (1938) please state:

(a) Who is the first person in defendant's employ who read this article;

(b) Where defendant obtained such article;

(c) When defendant, or its employee, first read

this article;

(d) The name of all persons in defendant's employ who read this article prior to 1970;

(e) What steps, if any, defendant took to determine the validity of the study upon which the article was based;

(f) If the person named in subpart (a) above is deceased, upon what facts do you base your statement that this person read this article at the aforementioned time.

ANSWER: Abex objects to this interrogatory on the grounds that it is premature and assumes facts not yet established. Subject to and without waiving these objections, Abex has not yet determined which contentions it intends to interpose at a trial of this action and reserves the right to supplement this answer when such a determination has been made.

53. If defendant contends that plaintiff's employer failed to take adequate precautionary measures to protect plaintiff from exposure to asbestos fibre or asbestos automotive products, please set forth, in detail, in what respect(s) plaintiff's employer did not take adequate precautionary measures, setting forth each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

54. Have any of the products listed in answer to interrogatory #6 of plaintiff's interrogatories to defendant, first set been patented at any time? If so, state:

(a) The patent number;

(b) When the patent was acquired.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

55. If defendant contends that plaintiff's injuries were in any way caused or aggravated by toxins, pollutants, or agents other than asbestos or tobacco, please state the name of each such agent, the injury it caused or aggravated, whether it has caused or aggravated his injuries, and every fact which supports the contention that plaintiff's injuries were so caused or aggravated.

ANSWER: See answer to interrogatory No. 40.

56. If defendant contends that the contact of asbestos friction materials against either brake drums or flywheels does not produce asbestos-containing dust, please set forth each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

57. If defendant contends that warnings are not necessary on asbestos-containing automotive products, including but not limited to friction materials, gaskets and shielding, please set forth each and every fact which supports that contention, and the names and addresses of persons with any knowledge.

ANSWER: See answer to interrogatory No. 40.

58. For each asbestos automotive product listed in your answer to interrogatory #6 of plaintiff's interrogatories to defendants, first set forth:

- (a) The type of asbestos fibre used in the product;
- (b) The percentage of the product comprised of

asbestos;

- (c) The vendor of the asbestos fibre contained in the product.

ANSWER: Abex objects to this interrogatory on the grounds that it overly broad, burdensome, seeks to violate "trade secrets" and is repetitive. Subject to and without waiving these objections, see Abex's answers to Plaintiff's first set of interrogatories.

59. Please set forth each and every method of affixing defendant's asbestos friction materials to metal shoes or plates from 1938 until the present.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time and scope, burdensome, lacks particularity as to what information is being requested, lacks relevance to this case and is vague and ambiguous.

60. Please state whether defendant is aware of the practice of using compressed air to remove accumulated dust and debris from brake drums or friction mechanisms during brake or clutch maintenance or repair.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time and scope, burdensome and lacks particularity as to what information is being requested, lacks relevance to this case and is vague and ambiguous.

61. If the answer to the preceding interrogatory is in the affirmative, please set forth:

(a) The date when defendant first became aware of this practice;

(b) How defendant became aware of this practice;

(c) Whether defendant recommended such practice in product literature, manuals, or instruction booklets, and if so:

(1) Set forth the dates during which such practices were recommended;

(2) Please attach a copy of any such product literature, manuals, or instruction booklets.

(d) The name and address of persons with any knowledge.

ANSWER: See answer to interrogatory No. 60.

62. Please set forth whether defendant is aware of the practice of grinding or bevelling asbestos friction materials.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time and scope, burdensome and lacks particularity as to what information is being requested, lacks relevance to this case and is vague, ambiguous and repetitive.

63. If the response to the preceding interrogatory is in the affirmative, please set forth:

(a) The purpose for which defendant's asbestos friction materials were ground or bevelled;

(b) The date when defendant first became aware of this practice;

(c) How defendant first became aware of this practice;

(d) Whether defendant recommended such practice in product literature, manuals, or instruction booklets, and if so:

(1) Please set forth the dates during which such practices were recommended;

(2) Please attach a copy of any such literature, manual or instruction booklets.

(e) The name and address of persons with any knowledge.

ANSWER: See answer to interrogatory No. 62.

64. Please state whether defendant is aware of the practice of drilling or punching holes in their asbestos friction products in order to affix such products to metal shoes or plates.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad as to time and scope, burdensome and lacks particularity as to what information is being requested, lacks relevance to this case and is vague and ambiguous.

65. If the answer to the preceding interrogatory is in the affirmative, please set forth:

(a) The date when defendant first became aware of this practice;

(b) How defendant first became aware of this practice;

(c) Whether defendant recommended such practice in product literature, manuals, or instruction booklets, and if so:

(1) If defendant did recommend such practice, please set forth the dates during which such practice was recommended;

(2) Please attach a copy of any such literature, manuals or instruction booklets.

(d) The name and address of persons with any knowledge.

ANSWER: See answer to interrogatory No. 64.

66. Please list each and every lawsuit involving your asbestos friction products in the following jurisdictions:

(a) Any Common Pleas Court in Pennsylvania;

(b) Any Federal Court in Pennsylvania;

(c) Any State Court in:

(1) New Jersey;

(2) New York;

(3) Delaware;

(4) California;

(5) Maryland;

(d) Any Federal Court in:

(1) New Jersey;

(2) New York;

(3) Delaware;

(4) California;

(5) Maryland.

ANSWER: Abex objects to this interrogatory on the grounds, that it is burdensome, overly broad, lacks relevance

to this case, is not reasonably calculated to lead to the discovery of admissible evidence and is a matter of public record to which plaintiff has access.

67. Please list the names and addresses of all plaintiff's attorneys in all these cases.

ANSWER: See answer to interrogatory No. 67.

CLAYTON H. THOMAS, JR.

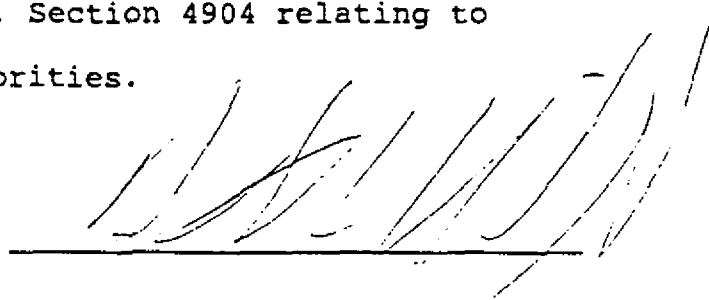
Clayton H. Thomas Jr.

By: Clayton H. Thomas, Jr.
Attorney for defendant
Abex Corporation

V E R I F I C A T I O N

I, DEXTER L. KENFIELD, do hereby verify that I am Corporate Counsel of Abex Corporation and am authorized to make this Verification on behalf of Abex Corporation, that I have read the foregoing Answers to Interrogatories (Set II) and know the contents thereof, and that the facts contained therein are true and correct to the best of my knowledge, information and belief.

I understand that false statements are made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

A handwritten signature in dark ink, appearing to read 'Dexter L. Kenfield', is written over a horizontal line.

Date: 7/30/87

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ALBERT DiSANTIS	:	CIVIL ACTION
	:	
v.	:	NO. 87-0515
	:	
ABEX CORPORATION, et al.	:	<u>ABESTOS CASE</u>

CERTIFICATE OF SERVICE

I hereby certify that a copy of Defendant, Abex Corporation's Answers to Plaintiffs' Interrogatories (Sets I and II) were mailed by first class mail, postage prepared, to counsel for Plaintiff and hand-delivered to all defense counsel listed on the attached sheet on October 2, 1987.

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