

Abex's products containing asbestos. Abex cannot answer this interrogatory absent such a definition or limitation.

34. Have you, at any time, been a member of any "trade association or organization" composed of other miners, manufacturers, suppliers, distributors, producers, processors, compounders, converters, sellers, merchandisers, and/or anyone otherwise placing in the stream of commerce asbestos products? If so, state:

- (a) Identify each such association or organization,
- (b) The dates during which you were a member?
- (c) The names of any publication published by or written by such association or organization;
- (d) The dates and addresses of all other members;
- (e) What meetings you attended and identify who attended;
- (f) Who spoke at such meetings;
- (g) Were transcripts or summaries or minutes or notes made of such meetings? If so, identify the above, tell specifically what was made and give the name, title and address of the person or persons who have custody of the transcripts and/or summaries and or minutes and/or notes mentioned above and state when and where counsel for the plaintiff may examine and copy these documents.

ANSWER: Abex objects to this interrogatory on the grounds that it is burdensome and overly broad. Subject to and without waiving these objections, Abex or its corporate predecessors were members of the following trade associations or organizations: Asbestos Information Association of North America (1975-1980) and the Brake Lining Manufacturers Association from an unknown date until 1949. Furthermore, Abex is