

Breathing Asbestos Dust May Cause Serious
Bodily Harm

Abex believes this warning was first placed on its asbestos-containing automotive friction products in order to comply with OSHA regulations. Abex does not believe the wording of this warning was ever changed. Discovery investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

Crossing Guard:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1975 and its trademark was sold in 1994. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged