automotive friction products was resin bound and encapsulated.

INTERROGATORY NO. 79:

State the date on which any official of Defendant or its predecessor (s) first had knowledge, notice, information or understanding that exposure to asbestos would, could or might cause each of the following diseases:

(5) Pleural disease;

(6) Asbestosis;

(7) Mesothelioma;

(8) Lung cancer;

(9) Any other forms of cancer.

RESPONSE TO INTERROGATORY NO. 79:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, it is impossible to form an answer to this interrogatory on the grounds that it fails to specify the circumstances of exposure, type of asbestos and other factors.

Without waiver of these objections, Abex responds that it is unaware of when it first became aware of any reported association between asbestos exposure and any particular health hazard.

INTERROGATORY NO. 80:

With respect to each disease set forth in Interrogatory No. 79:

(1) Identify the official who first obtained the knowledge, notice, information or understanding to which the interrogatory refers;