

among the different types of raw asbestos fiber, asbestos-containing building products and asbestos-containing automotive friction products. Abex further objects to this interrogatory on the grounds that it seeks a medical opinion which Abex is not qualified to render. This interrogatory is more suitably addressed to an expert witness Abex will designate at the appropriate time.

26. Do you have knowledge that use of the asbestos material listed in Answer No. 7 can cause or contribute to various occupational diseases, including asbestosis, mesothelioma, cancer and other lung and respiratory diseases? If your answer is "yes", state what that knowledge is and when it was received.

ANSWER TO INTERROGATORY NO. 26: No. Because the asbestos in Abex's asbestos-containing automotive friction products is resin-bonded and encapsulated, it did create or contribute to a health hazard.

27. Do you have knowledge that the use of asbestos insulating products listed in Answer No. 7 are dangerous and harmful to human health? If your answer is that your products are not harmful then explain what facts and tests were made upon which you base such conclusion.

If your answer is "yes", state what that knowledge is and when it was received.

ANSWER TO INTERROGATORY NO. 27: There are no asbestos insulating products listed in answer No. 7.

28. Do you have knowledge that the possibility of exposure to asbestos dust and fibers extends not only to workers actually handling the asbestos product but also to:

a. other workers in the area where the asbestos products are being used;