

RESPONSE TO INTERROGATORY NO. 77:

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.

Without waiver of these objections, Abex responds that upon information and belief it did not conduct tests of the kind described in this interrogatory. Abex considers its brake products to be inherently safe when used properly because the asbestos in Abex's asbestos-containing automotive friction products was resin bound and encapsulated.

INTERROGATORY NO. 78:

Did Defendant, any predecessor or any related company, at any time, directly advise the owners or management employees of any worksite in which it sold or applied any product listed in response to interrogatory Nos. 19 and 43, of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienist? If so, state the date or dates that you so advised each such owner or employees, the manner in which you advised such owner or employee and the name of each such owner or employee.

RESPONSE TO INTERROGATORY NO. 78:

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.

Without waiver of these objections, Abex responds that upon information and belief it is not aware of any information responsive to this request. Abex considers its brake products to be inherently safe when used properly because the asbestos in Abex's asbestos-containing