

ANSWER TO INTERROGATORY NO. 31: Abex objects to this interrogatory to the extent that it seeks information concerning the working conditions of Abex employees on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the grounds that it assumes facts not established. Proper use of Abex's asbestos-containing automotive friction products did not create or contribute to a health hazard.

32. State what, if any, safety measures were taken by you as to your employees, during the processing, manufacturing and packaging of products containing asbestos including but not limited to products that have been distributed by the DuPont Company. If any such safety measures were taken, state:

(a) The reason for the use of such measures, equipment or clothing;

(b) Identify each document relating to safety procedures taken by employees or plant personnel in the manufacture, processing and packaging of such products;

(c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER TO INTERROGATORY NO. 32: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, and, in seeking information concerning the working conditions of Abex employees, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

33. State: