Abex states that it was a member of the Friction Materials Standards Institute ("FMSI"). Abex was recently provided with an unauthenticated document in the course of litigation which purports to indicate that Abex performed at least one air sampling analysis to collect wear product particles during brake operation prior to November 8, 1971. Neither this document, nor any related documents, have been located in any Abex files.

INTERROGATORY NO. 60:

Please state the following with respect to each expert witness you that you may call during trial of these cases. Please designate with specificity the expert witnesses that you will call, including:

(a) The name, address, and job classification of each such expert witness;

ANSWER: Abex objects to this interrogatory on the grounds that it is premature. Abex has not yet determined which expert witnesses it intends to call at trial of this matter and reserves the right to supplement this answer once such a determination has been made.

(b) The subject matter on which the expert is expected to testify;

ANSWER: See Answer to Interrogatory No. 60(a).

(c) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;