

ANSWER: Abex objects to this interrogatory on the grounds that it assumes facts not established. Abex further objects on the grounds that this interrogatory fails to distinguish among the different types of raw asbestos fibers, asbestos in building products and asbestos in automotive friction products. To the extent this interrogatory seeks information concerning the working conditions of Abex employees, it is objected to on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, see answer to interrogatory No. 17.

19. Please state when Defendant first became aware of the possible association between inhalation of asbestos dust and/or fibers and the contraction of mesothelioma and peritoneal mesothelioma. State the source of that information including a description of all tests conducted relative to the possibility of such a relationship.

ANSWER: Abex objects to this interrogatory on the grounds that it fails to distinguish among the different types of raw asbestos fibers, asbestos in building products and asbestos in automotive friction products. To the extent this interrogatory seeks information concerning the working conditions of Abex employees, it is objected to on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, see answer to interrogatory No. 17.

20. Please state when Defendant first became aware of the association between the inhalation of asbestos dust and/or fibers and contraction of lung disease known as asbestosis and state the