

states that in 1972 at the latest, and perhaps earlier, Abex commenced the placement of warning labels on its asbestos-containing automotive friction products. This label read as follows:

Caution
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause Serious
Bodily Harm

Abex believes this warning was first placed on its asbestos-containing automotive friction products in order to comply with OSHA regulations. Abex does not believe the wording of this warning was ever changed.

20. Prior to releasing the asbestos product(s) listed in interrogatory 6 for sale, were any tests conducted on same to determine potential health hazards involved in the use, handling or exposure of the materials contained therein: If so, state:

(a) The identity of each individual or firm who conducted such tests;

(b) The date, purpose and result of each such test;

(c) Identify and produce all documents relating to such tests;

ANSWER TO INTERROGATORY NO. 20: Abex objects to this interrogatory on the grounds it is overly broad and burdensome. Abex further objects to the term "asbestos products." Abex never manufactured "asbestos products," but rather automotive friction products, some of which contained chrysotile asbestos as one of their components. Subject to and without waiving