

(7)

Good personal hygiene practices are important in minimizing asbestos dust exposure. Do not smoke. Wash before eating. Shower after work. Change to work clothes upon arrival at work and change from work clothes at conclusion of work. Work clothing should not be taken home. Laundering as asbestos contaminated clothing shall be done so as to prevent release of airborne asbestos fibers in excess of the exposure limits.

CAUTION: DO NOT BREATHE ASBESTOS

13. Identify any and all labeling or relabeling agreements in existence since 1939 between Defendant and other persons, including, if applicable, other asbestos products manufacturers.

ANSWER TO INTERROGATORY NO. 13: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, 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, documents which may be responsive to this request may be on file and, if so, may be made available for inspection and copying upon receipt of an appropriate document request.

14. Did you ever consider the resultant effect on sales of your asbestos products, of the public knowing of health hazards linked or allegedly linked to asbestos. If so, please state:

- a. the form of consideration;
- b. the date of the consideration;
- c. the names of each persons who considered the matter;
- d. if the consideration occurred at a meeting, the names and present business and home addresses of those attending; and
- e. the location and identifying codes of all records of such consideration.