

(e) Any evidence presently in existence which supports your answers to this Interrogatory or its sub-parts.

ANSWER TO INTERROGATORY NO. 44: Abex produced asbestos-containing automotive friction products. Abex therefore objects on the grounds that whether Abex received this report or not it not relevant to this case and is not reasonable calculated to lead to the discovery of admissible evidence. Abex also claims the attorney-client privilege, the work product doctrine, the investigative privilege and the party communication privilege. Subject to and without waiving these objections, Abex does not know whether it received a copy of this document other than in the course of litigation.

45. Has Defendant ever warned (sic) or instructed any person or entity that exposure to asbestos dust should be limited to or below a specific level of exposure? If so, please state:

(a) Whether the warning or instruction was oral or in writing;

(b) If such warning or instruction was in writing, the custodian of that document, as well as the date of the instruction or warning;

(c) The specific contents of any such instruction or warning;

(d) The identity of the person or entity to whom such instruction or warning was given, as well as the dates such instruction or warning was given;

(e) Any evidence presently in existence supporting your answers to the above-referenced questions and subparts of this Interrogatory.

ANSWER TO INTERROGATORY NO. 45: See answer to interrogatory No. 29. Abex further states that in 1979 and 1982 it participated in the preparation and distribution of a pamphlet published by the Friction Materials Standards Institute, Inc.