37. Do you have knowledge that any respirators or other breathing device prevent inhalation of the asbestos dust and fiber from your product? If so, state:

a. when the respirator was sold;

b. give the detailed description of such respirator or other breathing device;

c. the source of your knowledge that it would prevent the inhalation of such dust and fibers and date you received it;

d. identify any relevant tests performed by date, title, author, and number.

ANSWER TO INTERROGATORY NO. 37: Abex object to this interrogatory on the grounds that it assumes facts not established. Because the asbestos in Abex's asbestos-containing automotive friction products is resin-bonded and encapsulated, it did create or contribute to a health hazard.

38. For every policy of liability insurance insuring you against losses as a result of claims for bodily injury or death as a result of use of your asbestos products from @939 to the present, list:

a. the name of each insurer;

b each policy number;

c the term of such policy;

d. the amount of the coverage;

e. whether each policy provides for primary or excess coverage and if excess, the limits;

f. the deductible, if any, for each policy;

g. the basis of coverage for each;

h. the identity of the person having possession of each policy;

i. if the policy is involved in litigation concerning coverage of asbestos claims, identify that litigation by style and subject matter.