

to determine potential health hazards involved in the use of the materials and/or products? If so, please state:

- (a) The name, address, and job classification of each individual who conducted such tests;
- (b) The results of such tests.

ANSWER: Abex objects on the grounds that this interrogatory is repetitive. See answer to interrogatory No. 1.

12. Does Defendant have or control any written memoranda, specifications blueprints or other written materials of any kind or character relating to the testing of the asbestos-containing brake lining products listed in your response to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories?

- (a) Identify each such written material or document;
- (b) Identify each person who presently has possession of each such document;
- (c) State where each such document is located.

ANSWER: See answer to interrogatory No. 1.

13. Were any design changes made as a result of such tests listed in answer to Interrogatory No. 12 hereinabove? If so, please state:

- (a) The nature of the change made;
- (b) The name, address, and job classification of each person in charge of making a change.

ANSWER: See answer to interrogatory No. 12.

14. After releasing the asbestos-containing brake lining products listed in your response to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories to the public, did Defendant conduct any tests (either on animals or humans) to determine potential health hazards involved in the use of said materials and/or products?

- (a) The name, address, and job classification of each person and/or agency conducting said tests;
- (b) The results of said tests;