Without waiving these objections, Abex states that it commenced placing warning labels on all packages of asbestos-containing friction materials in 1972.

19. If the answer to the preceding interrogatory is in the affirmative, please state:

(a) When did the warning first appear?

(b) What was the precise wording of the warning when it first appeared?

(c) Was the warning altered, amended or changed in any manner? If so, how and when?

(d) Where was the warning located on the product or packaging?

(e) When did you become aware that warnings were placed on the products distributed by other defendants? State the reason warnings of the other defendants were not placed on your products.

(f) State the manner in which your product is shipped and the type of container it is shipped in to retailers.

(g) State whether any industrial psychologists or humar factors engineers were consulted prior to utilizing such warnings, cautions, etc.

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden

2. Overly Broad

Without waiving these objections, Abex states that in 1972, it commenced the placement of warning information on all packages of asbestos-containing friction products.

This warning information stated: