contribute to a health hazard. Abex further objects to this interrogatory on the grounds that it seeks information which has been gathered or prepared in the course of litigation or which is otherwise protected by the attorney-client privilege, the work product doctrine or any other applicable privilege. Subject to and without waiving these objections, Abex was recently provided with an unauthenticated document in the course of litigation which purports to indicate that Abex performed at least one air sampling analysis to collect wear product particles during brake operation prior to November 8, 1971. Neither this document, nor any related documents, have been located in any Abex files. See also Answer to Interrogatory No. 7.

INTERROGATORY NO. 9:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

A. A description of each such document.

B. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: See Answers to Interrogatory Nos. 7 and 8.

INTERROGATORY NO. 10:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests