

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 states that it was a member of the Friction Materials Standards Institute ("FMSI"). 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.

INTERROGATORY NO. 60.:

Please state the following with respect to each expert witness you that you may call during trial of these cases. Please designate with specificity the expert witnesses that you will call, including:

- (a) The name, address, and job classification of each such expert witness;
- (b) The subject matter on which the expert is expected to testify;
- (c) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;
- (d) Whether any person identified in subparagraph (a) above has provided a report or other documentation to you, and if so, identify each such document or report;
- (e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above;
- (f) Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above.