matters not established or matters not in evidence.

Subject to and without waiving these objections, insofar as Abex understands this interrogatory, and upon information and belief, the following individuals may have or may have had information responsive to this interrogatory:

Blume, William
Merkle, Timothy
Spokes, Raymond
Pearce, Richard
Kwolek, John
Griffith, Arvon
Nelson, Robert

The above-referenced individuals are not currently associated with Abex.

This answer is based upon such information as is currently and reasonably available to Abex, and Abex reserves the right to supplement or amend these answers when and if additional relevant information or documentation becomes available, including any provided by plaintiffs, at the appropriate time. Discovery and investigation are continuing.

Further, Abex discontinued the manufacture and sale of asbestos-containing friction products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all the records and documents that might be responsive to this interrogatory.

The available information, from which Abex would prepare a response to this interrogatory, is contained in files and records maintained by Abex. To prepare a response to this interrogatory would necessitate the preparation or the making of a compilation, abstract, audit, or