

available information and belief, some Abex automotive friction products may have undergone changes after sale by Abex and prior to reaching the ultimate end-user. Such changes may have included, for example, changes in size, shape, configuration, attachment to other brake system components, and incorporation into larger automotive products.

INTERROGATORY NO. 33: With respect to each product listed in response to Interrogatory No. 19, state whether, based upon the material contents, the method of manufacturing, and the method of application, such product could generally be applied or installed without liberating asbestos fibers?

SECOND AMENDED ANSWER TO INTERROGATORY NO. 33:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory to the extent it purports to seek information or materials regarding time periods and products that are not at issue in these cases, on the grounds that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the grounds that the information or materials it purports to seek otherwise lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, and to the best of current and reasonably available information and belief, Abex's asbestos-containing friction products could generally be applied or installed without liberating asbestos fibers.

INTERROGATORY NO. 34: This interrogatory has been withdrawn by plaintiff or stricken by the Court.

INTERROGATORY NO. 35: Identify each person who participated in the design and/or preparation of manufacturing specifications for each product listed in response to Interrogatory No. 19.