

SECOND AMENDED ANSWER TO INTERROGATORY NO. 35:

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, the following individuals may have or may have had information responsive to this interrogatory:

Blume, William
Kwolek, John
Merkel, Timothy
Nelson, Robert E.
Pearce, Richard
Spokes, Raymond

None of the above-referenced individuals is currently an officer, director or employee of 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 this answer when and if additional relevant information or documentation becomes available, including any provided by plaintiffs, at the appropriate time. Discovery and investigation are continuing.

INTERROGATORY NO. 36: Identify any and all documents, including, but not limited to, written memoranda, specifications, blueprints, formulas, patterns and designs, referring to, relating to or reflecting the design, preparation, application and/or installation of each product