

Brake Shoe:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1943 and its trademark was sold in 1994. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents will be made available through Abex counsel at a mutually convenient time and at a location conducive to production.

(d) Asbestos-containing automotive brake lining, manufactured by Abex were shaped into curved, linear segments in such dimensions as required by the specifications, characteristics and uses established by the manufacturer of the vehicle or the equipment on which the lining was applied.

(e) Abex friction products specifically, its brake linings, are generally designed to assist in the stopping or control of a moving object.

(f) Asbestos-containing automotive friction products manufactured and sold by Abex were generally packaged in