

SECOND AMENDED ANSWER TO INTERROGATORY NO. 27:

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 on the ground that it purports to shift the burden of establishing product identification from plaintiffs to Abex.

Abex further 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 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, some of Abex's asbestos-containing automotive friction products were generally packaged in plain, brown, or tan cardboard boxes according to size, with the end label being imprinted with colors. Abex packaging varied from product to product over the many decades of its corporate existence. Abex's asbestos-containing railroad friction products were generally shipped on pallets according to size.

INTERROGATORY NO. 28: For each subpart below, state whether or not, to Defendant's knowledge any items as described therein presently exist and, if so, identify any and all such existing items and state the present location of each:

- (a) any product listed in response to Interrogatory No. 19, including, but not limited to, any sample, part or piece thereof;
- (b) any package of the type in which any or all of the products listed in response to Interrogatory No. 19 were or would have been sold, including, but not limited to, any partial package;