

information or materials that have been gathered, received, or prepared in the course of litigation, or which are otherwise subject to the attorney-client privilege, protected by the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Abex discontinued the manufacture and sale of asbestos-containing railroad friction products in 1977 and asbestos-containing automotive 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.

Subject to and without waiving these objections, Abex is generally aware of the following transactions that may be responsive to this interrogatory, but has incomplete knowledge of them, including the extent, if any, to which the referenced businesses were associated with asbestos-containing products before, during or after their affiliation with Abex. In addition, there could have been other transactions potentially responsive to this interrogatory as to which Abex lacks current knowledge:

1971 sale of S.K. Wellman business to Brush-Wellman Corporation

1985 sale of AMSCO Welding Products business to Stooddy Company

1986 sale of Signal-Stat Division to Federal-Mogul Corporation

1986 sale of Denison Division to ASEA Inc.

1987 sale of Railroad Products Division to ABC Rail Corporation

1987 sale of Waukesha Pump Division to AMCA International Corporation