

as though set forth herein in full.

INTERROGATORY NO. 72: Did any warning of any type concerning the products listed in response to Interrogatory Nos. 19 and 43 ever appear in any sales literature or other materials distributed or provided by Defendant, any predecessor or any related company, to the purchasers, consumers and/or users of such products?

SECOND AMENDED ANSWER TO INTERROGATORY NO. 72:

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.

Abex objects to this interrogatory on the ground that it seeks to impose upon Abex a legal duty or obligation to which it was not subject.

Subject to and without waiving these objections, documents generally meeting the description of promotional and advertising materials, as well as sales brochures and pamphlets are maintained in the normal course of business at Abex's document repository, where non-privileged documents will be made available for inspection and copying upon request at a mutually convenient time.

Further, in 1979 and 1982, Abex participated in the preparation and distribution of a pamphlet published by the Friction Materials Standards Institute, Inc. entitled "Recommended