

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.

SECOND AMENDED ANSWER TO INTERROGAOTRY NO. 7 (b):

See Objections and Answer to Interrogatory No. 8, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 8: List all directors and officers of Defendant from 1940 to date, and for each state all positions held and the date(s) during which each position was held.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 8:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound and calls for speculation.

Pursuant to the Court's April 13, 2000 Order, Abex's answer to this interrogatory is limited to the years between 1930 and 1980.

Abex also objects to this interrogatory to the extent to which it purports to seek 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.

Subject to and without waiving these objections, and to the best of current and reasonably available information and belief, there are no present employees of Pneumo Abex.

Further, to the best of current and reasonably available information and belief, the name