

Abex has manufactured and sold asbestos-containing automotive friction products under the following trade names:

American Brake Materials
Brakeblok
American Brakeblok
Abex
Brake Shoe
Esline
Stopper
American Eagle
Crossing Guard
Protector
121 Superbrakes
Velvetouch

(a) All asbestos-containing automotive friction products manufactured by Abex contained approximately 25 to 65 percent chrysotile asbestos only.

(b) Friction products are designed to assist in the stopping or control of a rotating object.

(c) Abex objects to this subpart on the grounds that it is overly broad, burdensome and assumes facts not established. Abex further objects to this interrogatory on the grounds that it seeks information or materials which have been prepared in the course of litigation and are protected by the work product doctrine. Proper use of Abex's asbestos-containing automotive friction products did not create or contribute to a health hazard.

2. If any product identified in answer to Interrogatory No. 1 and was produced, manufactured and/or sold under a trade name, identify that trade name(s) and state the time period that each such product was under such trade name.

ANSWER TO INTERROGATORY NO. 2: See answer to interrogatory No. 1.

3. For each product identified in answer to Interrogatory No. 1, state: