

commercially sold raw asbestos. Abex's asbestos-containing automotive friction products were manufactured in Detroit, Michigan starting in approximately 1927 and ceased in the mid-1950's; in Salisbury, North Carolina starting in 1974 and ceased in 1987; and in Winchester, Virginia starting in 1947 and ceased in 1987. To the best of current and reasonably available information and belief, E.H. Feierabend (Winchester), Albert Indelicato (Salisbury), and Charles Mallory (Winchester) may have had some operational responsibilities over these plants. Abex does not have any specific knowledge or information as to whether any automotive friction products were manufactured at its former facility in Lancaster, New York. Said facility was destroyed in 1927. Abex is unaware of any documents that could indicate that asbestos-containing automotive friction products were manufactured at the Lancaster, New York facility prior to 1927. Abex's asbestos-containing railroad friction products were manufactured in Chicago, Illinois.

INTERROGATORY NO. 39: Withdrawn by plaintiff or stricken by the Court.

INTERROGATORY NO. 40: Identify any and all persons known by you to have any knowledge concerning the manufacture, sale, distribution, possession, application, installation or use of the products listed in response to Interrogatory No. 19.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 40:

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