

INTERROGATORY NO. 32: If your answer to Interrogatory No. 31 is "No" with respect to any product(s), explain in what manner Defendant claims said product(s) were altered or substantially changed after sale or distribution and before reaching the consumer or user

ANSWER TO INTERROGATORY NO. 32:

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 on the ground that it purports to shift the burden of establishing product identification from plaintiffs to Abex

Abex further 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 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 also objects to this interrogatory on the ground that it assumes the truth of matters not established or matters not in evidence

Subject to and without waiving these objections, insofar as Abex understands this interrogatory, and upon information and belief, some Abex products may have undergone changes after sale by Abex and prior to reaching the ultimate end-user. Such changes may have included, for example, changes in size, shape, configuration, attachment to other brake system components, and incorporation into larger automotive products