

such department throughout the years.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 49:

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 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, Abex maintained a corporate-wide research and development department. The purpose of this department included designing and developing new products for Abex. The duties and responsibilities of Abex's product research department were to ensure that Abex's friction products optimally performed the purpose for which they were designed, that is, to assist in the stopping or control of a moving object. Further information or materials related to this department lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.