In 1943, The American Brake Shoe and Foundry Company changed its name to American Brake Shoe Company. In 1966, American Brake Shoe Company changed its name to Abex Corporation.

(e) Abex Corporation has been qualified to do business in the State of North Carolina since August 22, 1974.

(f) Abex Corporation currently maintains a manufacturing facility in Salisbury, North Carolina.

3. Has this defendant been sued under its correct name? If not, state the correct legal name of the defendant and provide the information requested in No. 2 above concerning the defendant as correctly named.

ANSWER: Yes.

4. Has the Defendant, during the period of 1935 through the present, or any portion thereof, ever designed, manufactured, processed, sold, distributed or relabeled brake-linings and clutches or other friction products containing asbestos or asbestos fibers?

ANSWER: Yes.

5. If your answer to any part of No. 4 is in the affirmative, then give the brand and trade name of the product(s), and the year the defendant designed, sold, distributed, processed, manufactured or relabeled such product(s), being specific as to the inclusive dates for each product in each category.

ANSWER: Abex objects to this Interrogatory on the following grounds:

1. Burden