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:

SECOND AMENDED ANSWER TO INTERROGATORY NO. 55 SUBPART (a):

To the best of current and reasonably available information and belief, industrial hygiene surveys were conducted at Abex facilities.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 55 SUBPART (b):

To the best of current and reasonably available information and belief, industrial hygiene surveys were conducted at Abex facilities by Abex's industrial hygienists and their staff, and in at least one instance by an insurance carrier, in conjunction with Abex employees.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 55 (c) to (f)

To the best of current and reasonably available information and belief, unknown. Abex has made a reasonable and good faith effort to obtain the requested information, to the extent that it is not equally available to plaintiffs, by making a good faith search of locations where documents containing this information, if it exists, should be found, where appropriate, by inquiry to other natural persons or organizations.

Abex's lack of personal knowledge is due to the following: Abex discontinued the manufacture and sale of asbestos-containing railroad friction products in 1977 and asbestos-containing automotive friction products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for