revised answers, Abex in no way waives any rights it may have to challenge or appeal the Court's decision to overrule its objections, both general and specific, to these interrogatories. Abex reserves its right to supplement these revised answers should additional information become available.

SPECIFIC RESPONSES

2. Did any person prior to 1970, file a claim against any Workers' Compensation carrier covering Defendant alleging that he or she contracted a disease as a result of exposure to asbestos? If so, please state the following:

(a) A list of each such claim by claimant's name, date filed and jurisdiction involved;

(b) A brief summary of the disposition of each such claim.

ANSWER: Abex is not currently aware of any claim fitting such a description.

6. Please identify by location and product produced, each plant in which products listed in your answer to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories have been manufactured and/or assembled and the dates said plants have been in operation.

ANSWER: Abex manufactured asbestos-containing automotive friction products in Detroit, Michigan from 1927 to 1955; Salisbury, North Carolina from 1974 to 1987; and Winchester, Virginia from 1947 to 1987. The existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. Some of the documents and records are organized by subject matter. Discovery is continuing. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to

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