

domestic automotive and/or railroad friction products manufactured by Abex for the allegedly relevant time period only.

Abex never mined or commercially sold raw asbestos or asbestos products. To the best of current and reasonably available information and belief, Abex did not manufacture or sell asbestos-containing automotive brakes, brake assemblies or brake shoes. Nor did Abex ever manufacture, process, distribute, market or sell any asbestos-containing building insulation products. Abex was never involved in the installation or removal of any product. Neither did Abex ever own or operate a contract unit. Rather, Abex manufactured and sold automotive and railroad friction products, some of which contained chrysotile asbestos only.

These answers are based upon such information as is currently and reasonably available to Abex and Abex reserves the right to supplement or amend these answers when and if additional relevant information or documentation becomes available, including any provided by plaintiffs, at the appropriate time. Discovery and investigation are continuing.

Abex does not concede that any of its answers to these interrogatories are or will be admissible evidence at a trial of these actions. Abex does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answer at trial.

To the extent to which the information contained herein differs in any respect from any prior answer or response to discovery, these answers shall be deemed to update and supersede any prior answers or responses in any and all actions.

This Preliminary Statement and General Objections are explicitly incorporated into each of the answers set forth herein, as appropriate.