

asbestos.”

INTERROGATORY NO. 25: Identify each and every source from which Defendant, any predecessor or related company, obtained raw asbestos and/or asbestos-containing material used by Defendant, any predecessor or related company, to manufacture or process any product listed in response to Interrogatory No. 19.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 25:

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 on the ground that it purports to shift the burden of establishing product identification from plaintiffs to Abex.

Abex further 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 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.

Subject to and without waiving these objections, Abex does not possess complete knowledge concerning the identity of all its suppliers or the specific time periods of its purchase from specific suppliers of raw chrysotile asbestos fiber, which were the only asbestos fibers ever utilized by Abex in the manufacture of its asbestos-containing friction products. The extent of its knowledge is reflected below.

To the best of current and reasonably available information and belief, Abex is generally aware that, during various periods since 1948 and no later than 1987, when Abex ceased the