

products were not manufactured pursuant to any single formula. Variations in the formulas of Abex's asbestos-containing automotive products were to meet the customer's specifications for a specific application. Abex's asbestos-containing automotive friction products were generally sold in ready-to-use form. To the best of current and reasonably available information and belief, some Abex friction products were generally intended to reach the ultimate end-user in substantially the same condition as sold by Abex, while other Abex friction products were not. Abex's railroad friction products were intended to reach the ultimate end-user in substantially the same condition as sold by Abex.

INTERROGATORY NO. 32: If your answer to Interrogatory No. 31 is "No" with respect to any product(s), explain in what manner Defendant claims said product(s) were altered or substantially changed after sale or distribution and before reaching the consumer or user.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 32:

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, and to the best of current and reasonably