

Corporation merged with the American Brake Shoe and Foundry Company, and was thereafter operated as the American Brakeblok Division of that company. In 1943, the American Brake Shoe and Foundry Company changed its name to the American Brake Shoe Company. In 1966, the American Brake Shoe Company changed its name to Abex Corporation. In 1968, Abex Corporation was acquired by IC Industries, Inc.

In 1990, Abex was absorbed into its parent corporation, now known as Pneumo Abex Corporation. Abex's principal place of business is Camden, New Jersey. Pneumo Abex Corporation was incorporated in Delaware in 1986.

INTERROGATORY NO. 4:

Please state whether or not the Defendant has purchased, assumed, or in any other manner acquired any of the assets and/or liabilities of any corporation or entity (such corporations or entities being limited to those engaged in the mining, selling, manufacturing, marketing or distribution of asbestos-containing products.) If so, please state the following:

- (a) the name or description of each corporation, entity or assets acquired by Defendant, its state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;
- (b) the manner by which each such corporation, entity, or interest therein, was acquired (e.g. merger, consolidation, change of name, stock sale, transfer or purchase of assets or product line);
- (c) the date of each such acquisition;
- (d) the state in which each such acquisition was effected;
- (e) the state law governing each such acquisition if specified by contract;
- (f) whether Defendant became legally responsible for the past torts of each such corporation or entity;
- (g) whether the acquisition concerned asbestos-containing products.

RESPONSE TO INTERROGATORY NO. 4:

See General Objections. Abex further objects to this interrogatory on the grounds that it is overly broad, vague, ambiguous, speculative and repetitive.