with litigation, or any other applicable privilege.

Abex further objects to this interrogatory to the extent it purports to seek information that is a matter of public record, and thus, equally available to plaintiffs as Abex.

Subject to and without waiving these objections:

SECOND AMENDED ANSWER TO INTERROGATORY NO. 37 (a):

Chrysotile asbestos only.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 37 (b) and (c):

Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Abex's "Comet" railroad brake shoe contained approximately 5 percent chrysotile asbestos only.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 37 (d):

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 manufacture of asbestos-containing automotive friction products, raw chrysotile asbestos fibers were purchased from the following suppliers for use in manufacturing friction products:

Asbestos Corporation, Ltd.
Thetford Mines
Quebec, Canada

Bell Asbestos Mines, Ltd.
Thetford Mines