

submitting these revised answers, Abex in no way waives any rights it may have to challenge or appeal the Court's decision to overrule its objections, both general and specific, to these interrogatories. Abex reserves its right to supplement these revised answers should additional information become available.

#### ANSWERS

5. Has Defendant ever engaged in the mining, manufacturing, selling, marketing, or distribution of asbestos-containing products including brake linings, clutches, or any automotive friction products? If your answer is "yes," please state the following as to each product:

- (c) The time period during which it was manufactured, mined, marketed, distributed, or sold;
- (d) Its physical description including color, general composition and form;
- (e) A detailed description of its intended use and purpose;
- (f) A detailed description of the type of package in which it was sold and listing the:
  - (1) Dates of each type of package used;
  - (2) A physical description of the package;
  - (3) A description of any printed material or trademarks that appeared thereon;
  - (4) Any warning;
  - (5) The date each warning accompanied the package;
- (g) The percent of asbestos which it contained;
- (h) The percent of asbestos by asbestos type (Amosite, Chrysolite [sic], Tremolite and Anthrophyllite);
- (i) The time period during which it was on the market.

#### ANSWER TO INTERROGATORY NO. 5:

##### American Brake Materials:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1930 and its trademark was abandoned in 1971. Discovery and investigation is ongoing. Abex