RESPONSE TO INTERROGATORY NO. 53:

See General Objections. Abex further objects to this interrogatory on the grounds that it is speculative and premature. Discovery and investigation are continuing.

Abex further objects to this interrogatory on the ground that it purports to seek information or materials which have been gathered, received or prepared in the course of the asbestos litigation, or which are otherwise subject to the attorney-client privilege, the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Subject to and without waiving these objections, Abex expressly reserves the right to supplement or amend this answer, as appropriate.

INTERROGATORY NO. 54:

Please state the name and last known address of each expert witness who is not retained or employed for that purpose who is an employee of Defendant and will render an opinion within his expertise at the time of trial.

RESPONSE TO INTERROGATORY NO. 54:

See General Objections. Subject to and without waiving these objections, see objections and response to Interrogatory No. 52, above.

INTERROGATORY NO. 55:

Does Defendant admit that service of process was properly had on it in these cases? If not, please state why.

RESPONSE TO INTERROGATORY NO. 55:

See General Objections. Subject to and without waiving these objections, see Answer of Pneumo Abex Corporation, as successor-in-interest to Abex Corporation, to plaintiffs' complaint.