

SECOND AMENDED ANSWER TO INTERROGATORY NO. 17:

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, Abex manufactured and sold various asbestos-containing automotive friction products during various periods from approximately 1927 to 1987. To the best of current and reasonably available information and belief, Abex states it sold clutch facings from an unknown time period until approximately 1971. Abex manufactured and sold asbestos-containing railroad friction products from approximately 1957 to 1977.

INTERROGATORY NO. 18: State the last date on which Defendant or any related company specified, sold, distributed, applied and/or installed any asbestos-containing product outside the United States and identify by brand or trade name the products so specified, sold, distributed, applied and/or installed.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 18:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly