

1 In 1943, The American Brake Shoe and Foundry Company changed
2 its name to American Brake Shoe Company. In 1966, American Brake
3 Shoe Company changed its name to Abex Corporation.

4 INTERROGATORY NO. 3:

5 Has defendant, at any time from 1930 to the present, engaged
6 in the manufacture of products containing asbestos fibers?

7 RESPONSE:

8 Yes.

9 INTERROGATORY NO. 4:

10 If the answer to Interrogatory No. 3 is yes, please state:

11 (a) Where the asbestos-containing product [sic] were
12 manufactured;

13 (b) How long the defendant has manufactured and/or
14 distributed asbestos-containing materials;

15 (c) Whether defendant has supplied manufactured asbes-
16 tos materials to any other defendant herein since 1930;

17 (d) The dates of the transactions referred to in sub-
18 section (c);

19 (e) The compensation paid for the manufactured asbes-
20 tos materials;

21 (f) Whether any warnings, cautions, caveats or direc-
22 tions accompanied the materials referred to in (c); and

23 (g) The date the warnings, cautions, caveats or direc-
24 tions referred to in (f) first appeared.

25 RESPONSE:

26 (a) 1926-1927, Lancaster, New York

1926-1959, 4600 Merritt Avenue, Detroit, Michigan

1947-Present, Winchester, Virginia