

responsive to these interrogatories, and the burden of deriving or ascertaining the answer to most interrogatories is substantially the same for plaintiff as for Abex. The answers of Abex hereinafter set forth are limited to providing information concerning domestic automotive friction products manufactured by Abex for the relevant time period only. Abex has never mined asbestos, nor has Abex manufactured, processed, distributed, marketed or sold any asbestos-containing building products.

The information provided in these answers to interrogatories is based upon such information as is presently available to Abex, and Abex expressly reserves the right to supplement or amend these answers when and if additional relevant information or documentation is discovered. Some information provided herein is based upon knowledge obtained through a review of Abex's documents and records. This review is continuing. Abex does not concede that any of its answers to these interrogatories are or will be admissible evidence at a trial of this action, and Abex does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answer at trial.

To the extent that the information contained herein differs in any respect from any prior answer to discovery, these answers shall be deemed to update and supersede any prior answers in any and all actions. This introduction and the