

In 1968, Abex Corporation became a wholly owned subsidiary of Illinois Central Industries, Inc. Illinois Central Industries, Inc. later changed its name to IC Industries, Inc. Abex later became a wholly owned subsidiary of IC Products Company, itself a wholly owned subsidiary of IC Industries, Inc. (IC Industries, Inc. changed its name to Whitman Corporation in 1988).

In 1990, Abex was absorbed into its parent corporation, now known as Pneumo Abex Corporation.

Further, there may be additional corporate acquisitions involving Abex which are potentially responsive to this interrogatory but due to the passage of time, the change of the nature of its business, and the change in personnel, Abex lacks current knowledge of any such acquisitions. Abex discontinued the manufacture and sale of asbestos-containing friction products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all the records and documents that might be responsive to this interrogatory.

The available information, from which Abex would prepare a response to this interrogatory, is contained in files and records maintained by Abex. To prepare a response to this interrogatory would necessitate the preparation or the making of a compilation, abstract, audit, or summary of or from these files and records. No such compilation, abstract, audit, or summary presently exists. The burden and expense of preparing or making such a compilation, abstract, audit, or summary would be substantially the same for plaintiffs as for Abex.