

- (c) any catalogue, brochure, sales literature or like item referring to, relating to or reflecting any or all of the products listed in response to Interrogatory No. 19;
- (d) any picture, drawing, photograph or like representation of the items described.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 28:

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 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:

SECOND AMENDED ANSWER TO INTERROGATORY NO. 28 (a)

A "Comet" brake shoe is in possession of Abex's counsel.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 28 (b)

Two types of sample packages for "Abex" automotive friction products are in the possession of Abex's counsel.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 28 (c):

Abex does not know with certainty when each material was used to promote or advertise