

- (i) Identify any and all documents referring to, relating to or reflecting, said warning, its drafting, and/or the decision to place the warning on said product, including, but not limited to, any communication as described in subpart (h) of this interrogatory.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 65:

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 causation 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 ground 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.

Abex also objects to this interrogatory on the ground that it seeks to impose upon Abex a legal duty or obligation to which it was not subject.

Subject to and without waiving these objections, and to the best of current and reasonably available information and belief, the warning labels were affixed to automotive friction product cardboard packaging. Abex can make available for inspection photographs of the warning labels that were affixed to Abex's automotive friction product sample cardboard box packaging, which are in the possession of Abex's counsel at a mutually convenient time, upon receipt of an appropriate worded document request.