

SECOND AMENDED ANSWER TO INTERROGATORY NO. 19:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, duplicative, 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 otherwise 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, and to the best of current and reasonably available information and belief, Abex manufactured and sold its asbestos-containing automotive friction products under one or more of the following trade names at various times:

<u>Trade Name</u>	<u>Year of Registration or First Use</u>
American Brake Materials	1930
Brakeblok.	1936
American Brakeblok	1938
Abex	1941
Brake Shoe	1943
Eslin	1965
Stopper	1966
American Eagle	1974
Crossing Guard	1975
Protector	1975