

"material components," "material . . . ingredients," "non-asbestos ingredients" and "distinguished" are undefined or insufficiently defined, and call for speculation.

Abex further 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 to which it seeks information regarding time periods and products that are not at issue in this case on the ground that such information lacks relevance, and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the ground that the information it seeks otherwise lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory to the extent to which it purports to seek information that is a matter of public record and, thus, equally available to plaintiffs as Abex.

Subject to and without waiving these objections, and insofar as Abex understands this interrogatory:

RESPONSE TO INTERROGATORY NO. 5 SUBPART (a):

See objections and response to Interrogatory No. 3, above.

RESPONSE TO INTERROGATORY NO. 5 SUBPART (b)(1):

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

Abex
American Brake Materials
American Brakeblok
American Eagle
American Brake Shoe
Brakeblok
Crossing Guard
Esline