

121 Super Brakes
Protector
Stopper
Velvetouch Organik

RESPONSE TO INTERROGATORY NO. 5 SUBPART (b)(2):

Abex further objects to this subpart on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent that it requests information which is not within the personal knowledge, possession or control of Abex, its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of Abex. Abex's corporate existence spans a period of almost one hundred years, during which time it underwent numerous changes in its corporate structure, management, headquarters and name.

Abex further objects to this subpart on the grounds that the terms "identification number" are overly broad, vague, ambiguous, and speculative.

Abex further objects to this subpart on the ground that it attempts to shift the burden of establishing product identification from plaintiffs to Abex.

Abex further objects to this subpart to the extent to which it purports to seek information which has been gathered, received or prepared in the course of litigation, or which is otherwise protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege.

Subject to and without waiving these additional objections, Abex responds that it no longer manufactures, distributes or sells asbestos-containing friction materials of any kind. Abex no longer operates any asbestos-containing friction product manufacturing facilities, and no longer employs any persons in this regard.