

1 INTERROGATORY NO. 1:

2 State the name, present address, and capacity of title of
3 the individual signing these Interrogatories on behalf of the
4 answering defendant.

5 RESPONSE:

6 A. H. Casey, Jr., Abex Corporation, Six Landmark Square,
7 Stamford, Connecticut 06904, is verifying the answers to inter-
8 rogatories.

9 INTERROGATORY NO. 2:

10 Please state the address of your principal place of business
11 and whether you have assumed the assets and/or liabilities of any
12 predecessor corporation or entity. Answer these Interrogatories
13 for each such acquired company which manufactured products con-
14 taining asbestos.

15 RESPONSE:

16 OBJECTION. Interrogatory No. 2 is objected to on the
17 grounds that it is overly broad, vague, ambiguous and unintelli-
18 gible. Without waiving said objection, and in the spirit of
19 liberal discovery, defendant responds that the American Brake
20 Shoe and Foundry Company, a Delaware Corporation, was incorpo-
21 rated in 1916. In 1926, The American Brake Shoe and Foundry
22 Company caused to be incorporated a New York Corporation entitled
23 American Brake Materials Corporation. In 1933, American Brake
24 Materials Corporation changed its name to American Brakeblok
25 Corporation. In 1937, American Brakeblok Corporation merged with
26 the American Brake Shoe and Foundry Company and was thereafter
27 operated as the American Brakeblok Division of that company.

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