

3. If the answer to one or more of the last two questions is affirmative, please state as to each affirmative answer the following:

a) The trade or brand name of such product mined, manufactured, and/or marketed. Brake linings have been manufactured by Abex under the following trade or brand names:

ANSWER: 1) American Brake Materials; 2) Brakeblok; 3) American BrakeBLOK; 4) Abex; 5) Brake Shoe; 6) Esline; 7) Stopper; 8) American Eagle; 9) Crossing Guard; 10) 121 Super Brake; 11) Velvetouch.

b) The dates each such products was placed on the market:

ANSWER: The following are the years of registration of the above brand names:

1) 1930; 2) 1936; 3) 1938; 4) 1941; 5) 1943; 6) 1965; 7) 1966; 8) 1974; 9) 1975; 10) 1975; 11) 1968.

c) The dates each of such products was withdrawn from the market

ANSWER: 1) 1971; 2) 1971; 3) Active; 4) Active; 5) Active; 6) Active; 7) Active; 8) 1980; 9) Active; 10) Active; 11) 1970.

d) A description of the physical (the chemical) composition of each such product including the type of asbestos contained in each such product (i.e., amosite, chrysotile or crocidolite) and the quantitative percentage of asbestos in each product.

ANSWER: Abex objects to this Interrogatory on the grounds that it calls for privileged trade secret information of this defendant, without waiving such objection, however, Abex states that asbestos brake lining is an asbestos based material containing fillers, friction stabilizers and friction enhancers, bound by heat reacting phenolic resin.

e) A description of the physical appearance of each such product

ANSWER: Generally, brake lining is curved to a given drum diameter and is produced to a given length, width and thickness. Disc brakes are flat and make to different configurations to fit a flat rotor.