

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

BEVERLY KATHLEEN HORSCH, etc.,	)	CASE NO. 409994
	)	
Plaintiff,	)	JUDGE RICHARD MCMONAGLE
	)	JUDGE HARRY A. HANNA
v.	)	(Asbestos Docket)
	)	
A-BEST PRODUCTS COMPANY, et al.,	)	
	)	
Defendants.	)	

**DEFENDANT PNEUMO ABEX CORPORATION'S RESPONSES
TO PLAINTIFFS' REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to the Ohio Rules of Civil Procedure, defendant Pneumo Abex Corporation, as successor-in-interest to Abex Corporation ("Abex"), hereby responds to Plaintiffs' Requests For Production, as follows:

INTRODUCTION AND GENERAL OBJECTIONS

Abex has neither mined asbestos, nor has Abex manufactured, processed, distributed, marketed or sold any asbestos-containing building products. The responses of Abex hereinafter set forth are limited to providing information concerning domestic automotive friction products manufactured, sold or distributed by Abex for the relevant time period only.

The information provided in the responses to these requests is based upon such information as is presently available to Abex, and Abex expressly reserves the right to supplement or amend these responses when and if additional relevant information or documentation becomes available. Some information provided herein is based upon knowledge obtained through a review of Abex's documents and records. This review is continuing. Abex does not concede that any of its responses to these requests are or will be admissible evidence at