

Subject to and without waiving these objections:

SECOND AMENDED ANSWER TO INTERROGATORY NO. 20 (a):

American Brake Shoe and Foundry Company, American Brake Materials Corporation, American Brakeblok Corporation, American Brake Shoe Company.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 20 (b):

Abex first manufactured and sold asbestos-containing automotive friction products in approximately 1927. To the best of current and reasonably available information and belief, Abex states it is unaware of the date that it first started selling clutch facings. Abex first manufactured and sold asbestos-containing railroad friction products in approximately 1957.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 20 (c):

Abex ceased manufacturing and selling its asbestos-containing automotive friction products in 1987. To the best of current and reasonably available information and belief, Abex ceased selling clutch facings in approximately 1971. Abex ceased manufacturing and selling its asbestos-containing railroad friction products in 1977.

INTERROGATORY NO. 21: Were any of the products, which were listed in response to Interrogatory No. 19 as having been specified, sold, distributed, applied or installed by Defendant, its predecessor or related company(ies), purchased from another company and relabeled for sale or distribution by Defendant, its predecessors or related companies? If so, identify those products, and with respect to each:

- (a) Identify the company from which Defendant, its predecessor or related company purchased the product; and
- (b) Identify the company which manufactured the product; and,
- (c) State the date(s) during which said re-labeled product was sold, distributed or applied.