

SECOND AMENDED ANSWER TO INTERROGAOTRY NO. 7 (c):

To the best of current and reasonably available information and belief, Abex manufactured and sold automotive friction products. Abex states it manufactured and sold brake blocks, brake linings and brake pads. In addition, Abex sold clutch facings. Abex states it manufactured and sold railroad brake shoes.

SECOND AMENDED ANSWER TO INTERROGAOTRY NO. 7 (d) and (g):

Abex does not know with certainty when each material was used to promote or advertise its asbestos-containing automotive friction products. Furthermore, Abex does not have specific information or materials concerning which advertising agents may have been employed to promote its products. However, documents generally meeting the description of promotional and advertising materials, as well as sales brochures and pamphlets are maintained in the normal course of business at Abex's document repository, where non-privileged documents will be made available for inspection and copying upon request at a mutually convenient time.

SECOND AMENDED ANSWER TO INTERROGAOTRY NO. 7 (e):

To the best of current and reasonably available information and belief, unknown. Abex has made a reasonable and good faith effort to obtain the requested information, to the extent that it is not equally available to plaintiffs, by making a good faith search of locations where documents containing this information, if it exists, should be found, where appropriate, by inquiry to other natural persons or organizations.

Abex's lack of personal knowledge is due to the following: Abex discontinued the manufacture and sale of asbestos-containing railroad friction products in 1977 and asbestos-containing automotive friction products in 1987 and no longer operates any friction product