

SECOND AMENDED ANSWER TO INTERROGATORY NO. 10(c):

Pneumo Abex LLC was organized in the State of Delaware.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 10(d):

Pneumo Abex LLC was organized in the State of Delaware in 2004.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 10(e):

The former Abex Corporation was qualified to do business in the State of Illinois on November 16, 1916 and was withdrawn on April 2, 1992.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 10(f):

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 manufacturing facilities. There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all the records and documents that might be responsive to this interrogatory.

Abex's corporate existence spans a period of more than one hundred (100) years, during which time it underwent numerous changes in its corporate structure, management, headquarters