

compound, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this request as it purports to seek information and materials equally available to plaintiffs as defendants. Therefore, the burden of deriving or ascertaining the response to this interrogatory, is substantially the same for plaintiff as Abex.

Without waiver of these objections, Abex responds that the former Abex Corporation, Pneumo Abex Corporation's predecessor, was incorporated as the American Brake Shoe and Foundry Company in New Jersey in 1902, and was reincorporated as that company in 1916 in Delaware. In 1926, the American Brake Shoe and Foundry Company caused to be incorporated a New York corporation named American Brake Materials Corporation. In 1933, American Brake Materials Corporation changed its name to American Brakeblok Corporation. In 1937, American Brakeblok Corporation merged with the American Brake Shoe and Foundry Company, and was thereafter operated as the American Brakeblok Division of that company. In 1943, the American Brake Shoe and Foundry Company changed its name to the American Brake Shoe Company. In 1966, the American Brake Shoe Company changed its name to Abex Corporation. In 1968, Abex Corporation was acquired by IC Industries, Inc.

In 1990, Abex was absorbed into its parent corporation, now known as Pneumo Abex Corporation. Abex's principal place of business is New York, New York.

INTERROGATORY NO. 4:

Has Defendant been sued under its correct legal name? If not, state the correct legal name of Defendant and provide the information requested in No. 3 above concerning the defendant as correctly named.

RESPONSE TO INTERROGATORY NO. 4: