

the other hand, as well as documents prepared at the request of, or for the benefit of such counsel or setting forth mental impressions of the attorneys on matters concerning Abex. These documents, include, but are not limited to, correspondence, memoranda, notes of telephone conversations and other records relating to workers' compensation and personal injury issues, claims and litigation (asbestos and non-asbestos related); environmental issues, claims and litigation; insurance coverage issues, claims and litigation; real estate issues, claims and litigation; real estate and business transactions; labor and employment issues, claims and litigation; anti-trust issues, claims and litigation; legal issues related to corporate governance or management; as well as other legal issues, transactions and claims.

When a plaintiff avails himself or herself of the offer to inspect the documents, Abex will remove any documents with respect to which it claims privilege, on a box-by-box basis, and will prepare and serve a privilege log on plaintiff within sixty (60) days after the last date upon which the documents were inspected. Any dispute as to the propriety of any objection can thereafter be resolved by the Court.

**SECOND AMENDED ANSWER TO INTERROGATORY NO. 37 (h) and (i):**

Abex ceased manufacturing and selling its asbestos-containing automotive friction products in 1987 due to a shift in the demand for friction products.

**SECOND AMENDED ANSWER TO INTERROGATORY NO. 37 SUBPART (i)**

Chrysotile asbestos, the only type of asbestos fibers ever used by Abex in the manufacture of its friction products were utilized in Abex's asbestos-containing friction products because it represented a uniquely favorable combination of properties, including thermal stability, friction level, reinforcing properties, cost, availability, compatibility with production processes and