

SECOND AMENDED ANSWER TO INTERROGATORY NO. 21:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory to the extent it purports to seek information or materials regarding time periods and products that are not at issue in these cases, on the grounds that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the grounds that the information or materials it purports to seek otherwise lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, and to the best of current knowledge and belief, Abex is unaware of any agreements for the rebranding of asbestos-containing friction products manufactured by others for resale by Abex. Abex has found no documents or information indicating an agreement for Abex to rebrand and sell under its own name asbestos-containing friction products manufactured by someone else. Abex is aware of information indicating that it may have purchased automotive friction products from Raybestos and Bendix Corporation. It is not known whether the product(s) purchased contained asbestos. 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-