

burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory on the grounds that the information or materials it purports to seek lack relevance to the issues arising in these cases and are not calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, Abex was a member of the following trade associations: Asbestos Information Association of North America (1975 to 1980); the Brake Lining Manufacturing Association (from an unknown period to 1949); the Air Pollution Control Association; the Manufacturers Alliance for Productivity and Innovation (formerly, the Machine and Allied Products Institute); and the Friction Materials Standards Institute, Inc. (1949 to 1994). Furthermore, based upon information and belief, Abex was a member of the Air Hygiene Foundation of America, Inc. (which later became the Industrial Hygiene Foundation) (1937 to 1961) and the American Industrial Hygiene Association, although such membership is neither confirmed nor corroborated by the records maintained by or in the possession of Abex.

Within the past few years, Abex has been provided with historical documents from other parties that list American Brake Shoe & Foundry Co., and/or certain of its employees as members of the National Safety Council ("NSC"). It is not known if all of the employees of American Brake Shoe & Foundry who are listed as members or attendees at NSC functions were employed by Abex with respect to the manufacture or sale of friction materials that contained asbestos. These historical documents also reflect that some employees of American Brake Shoe & Foundry may have been trustees/members of the NSC. Abex has not found any information in its files evidencing a corporate membership in the NSC. Abex's investigation continues and it reserves the right to supplement this answer if additional, relevant material becomes available.