

Manufacturing Association (from an unknown period to 1949). Furthermore, Abex was a member of the Friction Materials Standards Institute (1949 to present); The American Industrial Hygiene Association ("AIHA"); The Air Pollution Control Association; the Manufacturers Alliance for Productivity and Innovation (formerly the Machinery and Allied Products Institute).

Abex is aware that some of its employees attended some meetings of the Industrial Hygiene Foundation ("IHF"), however, Abex has not found any information in its files evidencing a corporate membership in IHF.

32.1 Please state whether Defendant at any time has been a member of the Frictions Materials Standards' Institute, and if so, please identify the dates of membership, and the names of any publications issued or written by such association or organization.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, see answer to interrogatory No. 32. Abex further states that it lacks sufficient information to respond regarding publications of the Frictions Materials Standards' Institute.

32.2 Please state whether the Defendant at any time has been a member of The Brake Lining Manufacturers' Association, and if so, please identify the dates of membership, and the names of any publications issued or written by such association or organization.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, see answer to interrogatory No. 32. Abex further states that it lacks sufficient information to respond