

State of Illinois; and

- (f) Identify any and all documents referring to, relating to or reflecting the acquisition.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 11:

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

Pursuant to the Court's April 13, 2000 Order, Abex's answer to this interrogatory is limited to the years between 1930 and 1980.

Abex also objects to this interrogatory to the extent it purports to seek information or materials regarding time periods 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.

Abex objects to this interrogatory to the extent it purports to seek information that is a matter of public record, and thus, equally available to plaintiffs as Abex.

Subject to and without waiving these objections:

SECOND AMENDED ANSWER TO INTERROGATORY NO. 10(a):

Pneumo Abex LLC, successor in interest to Abex Corporation.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 10(b):

Pneumo Abex LLC's principal place of business is located at 35 East 62nd Street, New York, New York.