

SECOND AMENDED ANSWERS

INTERROGATORY NO. 1: Identify the person answering these interrogatories on behalf of Defendant.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 1:

Information used to respond to these interrogatories has been gathered over the course of many years and by different persons, so that it is impossible to attribute the information to any specific individual(s) or source(s). Abex sought and received the assistance of its legal counsel in the preparation of these answers. Information has also been gathered from documents that are maintained in the normal course of business at Abex's Brooklyn, New York document repository, where non-privileged documents, to which objection is not made, will be made available for inspection and copying through Abex's counsel at a mutually convenient time, upon receipt of an appropriately worded document request. Dexter L. Kenfield, a vice president of Pneumo Abex LLC, 35 East 62nd Street, New York, New York, has signed the verification to these answers. Mr. Kenfield was employed by Abex as Corporate Counsel from 1986 to 1995 and has been a vice president of Pneumo Abex LLC since November 2004.

INTERROGATORY NO. 2: Has the person answering these interrogatories made reasonable inquiry of all available sources of information such that Plaintiff may rely upon these answers as the truthful and complete answers made on behalf of Defendant? List any and all such sources of information relied upon.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 2

To the best of current and reasonably available information and belief, Dexter L. Kenfield, a vice president of Pneumo Abex LLC, 35 East 62nd Street, New York, New York, has signed the certification to these answers to interrogatories, after being advised that they reflect all information reasonably available to Pneumo Abex LLC. See Certification (attached).