



IN THE CIRCUIT COURT
OF THE EIGHTH JUDICIAL COURT
CASS COUNTY, ILLINOIS

Recd 4/20/95

----- X
ROSE SPEARS, AS SPECIAL :
ADMINISTRATOR FOR WILLIAM :
SPEARS, DECEASED, :
 :
Plaintiff, :
V. :
 :
A. P. GREEN, ET AL. :
 :
Defendants. :
----- X

ABEX CORPORATION'S REVISED ANSWERS TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES

INTRODUCTION AND GENERAL OBJECTIONS

Pneumo Abex Corporation, Successor-in-Interest to Abex Corporation ("Abex"), by and through its attorneys of record, Swain, Hartshorn & Scott, submits the following revised answers to plaintiffs' first set of interrogatories. These revised answers are submitted in accordance with the Court's order dated April 3, 1995 in the captioned action overruling defendants' objections to various interrogatories propounded by plaintiffs in plaintiffs' first set of interrogatories. These revised answers are intended solely for use in the captioned action. By complying with the Court's order of April 3, 1995, Abex in no way authorizes the use of these revised answers to plaintiffs' first set of interrogatories in actions brought by any plaintiffs in other actions in this or any other jurisdictions, and shall not constitute a waiver of any objections Abex may assert in other actions to the same or similar interrogatories. Furthermore, by

submitting these revised answers, Abex in no way waives any rights it may have to challenge or appeal the Court's decision to overrule its objections, both general and specific, to these interrogatories. Abex reserves its right to supplement these revised answers should additional information become available.

ANSWERS

5. Has Defendant ever engaged in the mining, manufacturing, selling, marketing, or distribution of asbestos-containing products including brake linings, clutches, or any automotive friction products? If your answer is "yes," please state the following as to each product:

- (c) The time period during which it was manufactured, mined, marketed, distributed, or sold;
- (d) Its physical description including color, general composition and form;
- (e) A detailed description of its intended use and purpose;
- (f) A detailed description of the type of package in which it was sold and listing the:
 - (1) Dates of each type of package used;
 - (2) A physical description of the package;
 - (3) A description of any printed material or trademarks that appeared thereon;
 - (4) Any warning;
 - (5) The date each warning accompanied the package;
- (g) The percent of asbestos which it contained;
- (h) The percent of asbestos by asbestos type (Amosite, Chrysolite [sic], Tremolite and Anthrophyllite);
- (i) The time period during which it was on the market.

ANSWER TO INTERROGATORY NO. 5:

American Brake Materials:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1930 and its trademark was abandoned in 1971. Discovery and investigation is ongoing. Abex

expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents will be made available through Abex counsel at a mutually convenient time and at a location conducive to production.

(d) Asbestos-containing automotive brake lining, manufactured by Abex were shaped into curved, linear segments in such dimensions as required by the specifications, characteristics and uses established by the manufacturer of the vehicle or the equipment on which the lining was applied.

(e) Abex friction products specifically, its brake linings, are generally designed to assist in the stopping or control of a moving object.

(f) Asbestos-containing automotive friction products manufactured and sold by Abex were generally packaged in cardboard boxes according to size. The brand name appeared on the package as did the product name. Abex further states that in the mid-1970's at the latest, and perhaps earlier, Abex commenced the placement of warning labels on its asbestos-containing automotive friction products. This label reads as follows:

Caution
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause Serious
Bodily Harm

Abex believes this warning was first placed on its asbestos-containing automotive friction products in order to comply with OSHA regulations. Abex does not believe the wording of this warning was ever changed. Discovery investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

Brakeblok:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1936 and its trademark was abandoned in 1977. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information

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warning was ever changed. Discovery investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

American Brakeblok:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1936 and its trademark was sold in 1994. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents will be made available through Abex counsel at a mutually convenient time and at a location conducive to production.

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(e) Abex friction products specifically, its brake linings, are generally designed to assist in the stopping or control of a moving object.

(f) Asbestos-containing automotive friction products manufactured and sold by Abex were generally packaged in cardboard boxes according to size. The brand name appeared on the package as did the product name. Abex further states that in the mid-1970's at the latest, and perhaps earlier, Abex commenced the placement of warning labels on its asbestos-containing automotive friction products. This label reads as follows:

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(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is

ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

Abex:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1936 and its trademark was sold in 1994. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents will be made available through Abex counsel at a mutually convenient time and at a location conducive to production.

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(e) Abex friction products specifically, its brake linings, are generally designed to assist in the stopping or control of a moving object.

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Abex believes this warning was first placed on its asbestos-containing automotive friction products in order to comply with OSHA regulations. Abex does not believe the wording of this warning was ever changed. Discovery investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

Esline?

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1965 and its trademark was sold in 1994. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents will be made available through Abex counsel at a mutually convenient time and at a location conducive to production.

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(e) Abex friction products specifically, its brake linings, are generally designed to assist in the stopping or control of a moving object.

(f) Asbestos-containing automotive friction products manufactured and sold by Abex were generally packaged in

cardboard boxes according to size. The brand name appeared on the package as did the product name. Abex further states that in the mid-1970's at the latest, and perhaps earlier, Abex commenced the placement of warning labels on its asbestos-containing automotive friction products. This label reads as follows:

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Avoid Creating Dust
Breathing Asbestos Dust May Cause Serious
Bodily Harm

Abex believes this warning was first placed on its asbestos-containing automotive friction products in order to comply with OSHA regulations. Abex does not believe the wording of this warning was ever changed. Discovery investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

Stopper:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1946 and its trademark was sold in 1994. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the

existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents will be made available through Abex counsel at a mutually convenient time and at a location conducive to production.

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(e) Abex friction products specifically, its brake linings, are generally designed to assist in the stopping or control of a moving object.

(f) Asbestos-containing automotive friction products manufactured and sold by Abex were generally packaged in cardboard boxes according to size. The brand name appeared on the package as did the product name. Abex further states that in the mid-1970's at the latest, and perhaps earlier, Abex commenced the placement of warning labels on its asbestos-containing automotive friction products. This label reads as follows:

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Abex believes this warning was first placed on its asbestos-containing automotive friction products in order to comply with OSHA regulations. Abex does not believe the wording of this warning was ever changed. Discovery investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

Crossing Guard:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1975 and its trademark was sold in 1994. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged

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(e) Abex friction products specifically, its brake linings, are generally designed to assist in the stopping or control of a moving object.

(f) Asbestos-containing automotive friction products manufactured and sold by Abex were generally packaged in cardboard boxes according to size. The brand name appeared on the package as did the product name. Abex further states that in the mid-1970's at the latest, and perhaps earlier, Abex commenced the placement of warning labels on its asbestos-containing automotive friction products. This label reads as follows:

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Abex believes this warning was first placed on its asbestos-containing automotive friction products in order to comply with OSHA regulations. Abex does not believe the wording of this warning was ever changed. Discovery investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

Velvetouch:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1923 and its trademark was withdrawn in 1970. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents will be made available through Abex counsel at a mutually convenient time and at a location conducive to production.

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characteristics and uses established by the manufacturer of the vehicle or the equipment on which the lining was applied.

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(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

Brake Shoe:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1943 and its trademark was sold in 1994. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents will be made available through Abex counsel at a mutually convenient time and at a location conducive to production.

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(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

American Eagle:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Abex believes that this friction product was manufactured from 1974 and its trademark abandoned in 1994. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the

existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents will be made available through Abex counsel at a mutually convenient time and at a location conducive to production.

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(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

Protector:

(c) Abex never mined asbestos. Abex manufactured and sold asbestos-containing automotive friction products from approximately 1926 to 1987. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer. In addition, the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to this interrogatory by making available for inspection and copying relevant, responsive, non-privileged documents. These documents

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(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent

chrysotile asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

121 Superbrakes:

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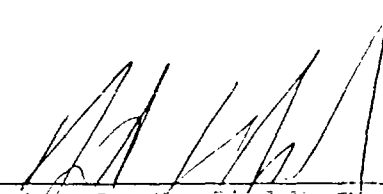
(g) Abex's asbestos-containing automotive friction products contained approximately 25 to 70 percent chrysotile-asbestos only. Discovery and investigation is ongoing. Abex expressly reserves the right to supplement this answer.

(h) See Answer to Interrogatory No. 5(g).

(i) See Answer to Interrogatory No. 5(c).

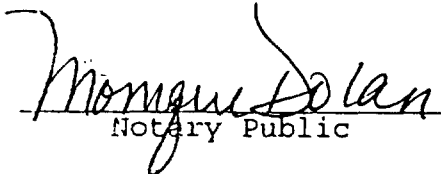
STATE OF NEW HAMPSHIRE)
) ss.:
COUNTY OF ROCKINGHAM)

DEXTER L. KENFIELD, being duly sworn, deposes and states that he is Corporate Counsel of Pneumo Abex Corporation, and that he verifies these Revised Answers to Plaintiff's First Set of Interrogatories for and on behalf of Pneumo Abex Corporation and is authorized to do so; that the facts stated herein have been assembled pursuant to his instruction and deponent is informed and believes the facts stated therein are complete, true and correct.



Dexter L. Kenfield, Esq.

Subscribed and sworn to
before me this 19th day
of April, 1995



Notary Public

MONIQUE DOLAN, Notary Public
My Commission Expires September 19, 1995