

1 (f) The location of the facility (facilities) where
2 the brake linings or brake assemblies were manufactured.

3 RESPONSE:

4 Please refer to Response to Interrogatory No. 118.

5 INTERROGATORY NO. 120:

6 Indentify all distributors of defendant's automobile brake
7 linings or brake assemblies in and for the State of California,
8 and for each distributor, state:

9 (a) The date(s) defendant's automobile brake linings
10 or brake assemblies were sold or delivered to said distributor;

11 (b) The quantity and type, including trade or brand
12 name(s), of defendant's automobile braking linings or brake as-
13 semblies sold or delivered to said distributor.

14 RESPONSE:

15 OBJECTION. Interrogatory No. 120 is objected to on the
16 grounds that it is overly broad, vague, ambiguous, burdensome and
17 calls for information which is not reasonably calculated to lead
18 to the discovery of admissible evidence. Further, the interroga-
19 tories calls for a compilation or abstract of records which does
20 not exist. This defendant has records pertaining to sales dating
21 back only to 1976.

22 INTERROGATORY NO. 121:

23 Has defendant directly or indirectly sold or distributed its
24 automobile brake linings or brake assemblies to any of the fol-
25 lowing:

- 26 (a) Chrysler-Plymouth Corp.;
- (b) Ford Motor Company;
- (c) General Motors;