Government, Chrysler Corporation and General Motors Corporation. Abex states it never manufactured or sold asbestos-containing automotive brakes, brake assemblies or brake shoes. Abex lacks personal knowledge and information sufficient to state the exact nature of the friction material sold to agencies of the United States Government, Chrysler Corporation and General Motors Corporation, such as whether it was strip lining material, brake block, disc brake caliper pads, or some other form of friction material. To attempt to ascertain this information, Abex has made a reasonable inquiry and good faith effort to obtain the requested information, to the extent that it is not equally available to plaintiffs, by making a good faith search of locations where documents containing this information, if it exists, should be found, where appropriate, by inquiry to other natural persons or organizations. However, additional information may be available in documents maintained in the normal course of business at Abex's Brooklyn, New York document repository, where pursuant to Illinois Rules of Civil Procedure, non-privileged documents will be made available upon request at a mutually convenient time.

Abex's lack of personal knowledge is due to the following: Abex discontinued the manufacture and sale of asbestos-containing railroad friction products in 1977 and asbestos-containing automotive friction products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all the records and documents that might be responsive to this interrogatory.

Abex's corporate existence spans a period of more than one hundred (100) years, during which time it underwent numerous changes in its corporate structure, management, headquarters