summary of or from these files and records. No such compilation, abstract, audit, or summary presently exists. The burden and expense of preparing or making such a compilation, abstract, audit, or summary would be substantially the same for plaintiffs as for Abex.

There are approximately 150 boxes, many of which comprise of approximately 2,000 - 3,000 pages, that contain the documents from which the response to this interrogatory may be ascertained or derived, details of which are as follows:

1. Winchester quality control.
2. Production plans.
3. Subject files, Friction products division.
4. Blueprints, Friction products division.
5. General correspondence.

Pursuant to the Illinois Code of Civil Procedure, plaintiffs will have a reasonable opportunity to examine, audit, inspect and to make copies, compilations, abstracts, or summaries of these boxes of documents, which will be produced to plaintiffs at Abex's facility in Brooklyn, New York, where they are maintained in the ordinary course of business, should plaintiffs decide to inspect them.

To the extent that any of the documents that plaintiffs decide to inspect were prepared in anticipation of litigation or for trial or are otherwise covered by the work-product doctrine, or are protected from disclosure by the attorney-client privilege, Abex objects and will not make such documents available to plaintiffs. Abex further objects to this interrogatory to the extent it purports to seek medical records or privileged personnel information. Abex will not provide such information absent an appropriate waiver of the applicable privilege.