(e) Nissan Motors,
(f) Mitsubishi Motor Car Division;
(g) Volkswagon;
(h) British Leyland;
(i) Sears & Roebuck.

RESPONSE TO INTERROGATORY NO. 121:

Wagner objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence and seeks proprietary business information.

INTERROGATORY NO. 122:

If the answer to any part of Interrogatory No. 123 is affirmative, please:

(a) state the date(s) during which defendant's automobile brake linings or brake assemblies were sold or distributed to each entity;

(b) state the quantity and type, including trade or brand name, of defendant's automobile brake linings or brake assemblies sold or distributed to each entity;

(c) identify and produce all documents relating to the sale of defendant's automobile brake linings or brake assemblies to each entity;

(d) identify each person within defendant's company having knowledge of sales and distributions to each entity.

RESPONSE TO INTERROGATORY NO. 122:

See Wagner's response to Interrogatory No. 123.

INTERROGATORY NO. 123:

Does defendant have or possess any data or information regarding any shipments, sales or distributions of automobile brake linings or brake assemblies by a manufacturer or distributor, other than itself, to any of the following entities:

(a) Chrysler-Plymouth Corp.;
(b) Ford Motor Company;
(c) General Motors;
(d) American Motors;
(e) Nissan Motors;
(f) Mitsubishi Motor Car Division;