

types of records, Abex will attempt to provide a meaningful response.

40. Identify all sales records in your possession concerning sales of your asbestos products in the state of New York, including invoices, shipping records, computer records, customer records and state for each:

- a. location;
- b. custodian;
- c. geographical distribution or areas covered by such records;
- d. time period;
- e. whether an index or summary exists;
- f. format or manner by which organized.

ANSWER TO INTERROGATORY NO. 40: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects on the grounds that information concerning Abex's sales, if any, in New York lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, invoices relating to sales of Abex's asbestos-containing automotive friction products are on file for a period beginning sometime in 1976 to 1987 only. These invoices, which may reflect sales of Abex's asbestos-containing as well as non-asbestos-containing automotive friction products, number well in excess of half a million. Such invoices, which may or may not reflect sales to the plaintiff's work sites, are arranged, for the most part, numerically and chronologically by year and not by customer, product or state. These invoices can be made available