(d) types receive;

(e) identify and produce all documents relating thereto.

ANSWER TO INTERROGATORY NO. 12: Not applicable.

13. Did you sell raw asbestos or finished asbestos products to the employers of employee plaintiff during or immediately prior to the periods of employment of plaintiff? If yes, identify:

(a) dates of sales;

(b) amounts of sales;

(c) names of finished asbestos containing products sold;

(d) amount of raw asbestos sold;

Invoice records can be attached to answer this interrogatory.

ANSWER TO INTERROGATORY NO. 13:

(a-c) Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, Abex is generally aware that it manufactured an asbestos-containing brake lining suitable for use on electric trolley motors. Abex does not know the time period or amounts of sales of this product. Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. 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