

(b) Identify all persons, firms or other entities to whom these products were sold or through whom they were distributed during the period 1936 to 1980;

(c) For each such person, firm or other entity identified in answer to subpart (b) above, state the following:

(1) the specific product sold and/or distributed;

(2) the quantity of the product sold and/or distributed;

(3) the dates which these products were sold, shipped and delivered to each entity;

(d) Identify each individual who has any knowledge of these sales and/or distribution and state with specificity and particularity the substance of each individual's knowledge;

(e) Identify and produce all documents which refer, reflect or relate to all sales and/or distribution of each such product to each such entity identified above.

ANSWER TO INTERROGATORY NO. 4: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, documents relating to sales of Abex's asbestos-containing automotive friction products, including invoices for a time period beginning sometime in 1976 to 1987, are on file. 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 as indicated in this interrogatory, are arranged, for the most part, numerically and chronologically by year and not by customer, product or state. These documents can be made available for inspection and copying upon receipt of an appropriate document request.