for inspection and copying upon receipt of an appropriate document request.

41. Identify all records of your purchase of raw asbestos including invoices, shipping records, and computer 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. 41: Because plaintiff has failed to identify exposure to any asbestos-containing products of this defendant, this interrogatory is objected to on the grounds that it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. All other grounds for objection are reserved pending possible future product identification.

42. If you maintain an index, summary, card catalog, computer listing, outline, or other listing of records stored or retained by your company pursuant to any record retention policy or otherwise, please identify each and state the location, custodian, time period, and documents covered.

ANSWER TO INTERROGATORY NO. 42: See answer to interrogatory No. 39.

43. Did your company ever sell or distribute any asbestos-containing products to Harry Belkin trading as Crosstown Auto Parts, 1149 Webster Avenue, New York, New York? If the answer is yes, please provide all invoices and sales records relating to the sale.