during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all the records and documents that might be responsive to this interrogatory

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Subject to and without waiving these objections, insofar as Abex understands this interrogatory, and upon information and belief, in the mid-1970s, and perhaps earlier, Abex commenced the placement of warning labels on its asbestos-containing friction products. Any discussion of warning labels for friction materials at a Friction Materials Standard Institute, Inc meeting may have taken place after Abex commenced placement of warning labels on its asbestos-containing products.

Abex discontinued the manufacture and sale of asbestos-containing friction products in 1987 and no longer operates any friction product manufacturing facilities There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all the records and documents that might be responsive to this interrogatory.

The available information, from which Abex would prepare a response to this interrogatory, is contained in files and records maintained by Abex To prepare a response to this interrogatory would necessitate the preparation or the making of a compilation, abstract, audit, or summary of or from these files and records. No such compilation, abstract, audit, or summary presently exists The burden and expense of preparing or making such a compilation, abstract, audit, or summary would be substantially the same for plaintiffs as for Abex