or receipt of asbestos materials to be used in the manufacture of the Defendant's brake shoes and/or linings.

RESPONSE: Defendant objects to this request as being overbroad and burdensome in that there is no time limit imposed, and further that it is vague in that it refers to "asbestos materials," which is undefined.

Defendant further responds by stating that it currently has such records only for the years 1976 to the present. For prior years it has only summaries which do not reflect in detail the type of products so purchased by Defendant from any co-defendant.

4. All invoices, purchase orders, sales receipts, inventory records, and any other written document involving the sale or distribution of any asbestos materials by the Defendant to be used in the manufacture of the co-defendants' brake shoes and/or linings.

RESPONSE: Defendant objects to this request as overbroad and burdensome in that there is no time limit imposed, and further that the request is unduly vague in that it requests documents concerning "asbestos materials," which term is undefined. Further, Defendant objects in that it requests documents concerning the intent of co-defendants in purchasing "asbestos materials" from Defendant, and this Defendant would have no way of knowing what the intent of the co-defendants was.

Defendant further responds by stating that it currently has such records only for the years 1976 to the present. For prior