information which is not within the personal knowledge, possession or control of Abex, its employees or agents, or which can be ascertained or derived only from a page-by-page review of the existing voluminous documents and records of Abex. There is no abstract, or summary of most records in Abex's possession which may be responsive to these discovery requests, and the burden of deriving or ascertaining the answer to most interrogatories is substantially the same for plaintiff as for Abex. The answers of Abex hereinafter set forth are limited to providing information concerning domestic automotive friction products by Abex for the relevant time period only. Abex has never mined asbestos, nor has Abex manufactured, processed, distributed, marketed or sold any asbestos-containing building insulation products.

Abex further objects to these interrogatories and requests to the extent the plaintiff implies that Abex's answers would be applicable to future cases. Abex cannot answer discovery regarding claims that have not made; accordingly, Abex's answers pertain to the captioned actions only. Furthermore, Abex's answers should not be construed as appearances in any future asbestos-related personal injury or death cases filed in El Paso County.

The information provided in these answers to requests and interrogatories is based upon such information as is presently available to Abex, and Abex expressly reserves the right to supplement or amend these answers when and if additional relevant information or documentation is discovered. Some