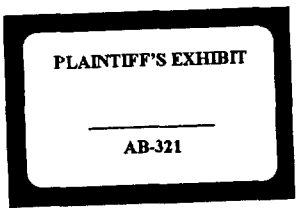
IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT OF ILLINOIS
PEORIA COUNTY



WILMER NALL, Plaintiff,	)	
vs.	)	Case No. 81-L-3550
RAYBESTOS-MANHATTAN, INC., et al., Defendants.	)	

RESPONSE AND OBJECTION TO
REQUEST TO PRODUCE

NOW COMES the Defendant, ABEX CORPORATION, by its attorneys, SWAIN, JOHNSON & GARD, and makes this response to Plaintiff's Supplemental Request to Produce.

1. All invoices, purchase orders, sales records, inventory records, and any other written documents involving the purchasing or receiving by the Defendant of finished manufactured brake shoes and/or lining products from any of the named co-defendants in this suit.

RESPONSE: Defendant objects to this interrogatory as over-broad to the extent it requests documents for years other than 1960-1975. Plaintiff's deposition reveals that his exposure to asbestos was limited to the arcing of brake shoes, and such work was performed only from the mid sixties through 1975. Defendant further objects to this request in that is unduly burdensome in that it is estimated that at least 2 weeks' work would be required to search for the documents requested here, plus costs for reproduction and transportation.