by ABEX CORPORATION, the American Brake Shoe Company, the American Brakeblok Co., or the American Brake Materials Co. were arced or ground by any employee of Pekin Machine & Parts Co. at anytime that WILMER NALL worked at Pekin Machine & Parts Co.

4. WILMER NALL or his attorneys know of no witness who has stated that brake linings manufactured by ABEX CORPORATION, the American Brake Shoe Company, the American Brakeblok Co., or the American Brake Materials Co. were arced or ground at Pekin Machine & Parts Co. during the time WILMER NALL was employed at Pekin Machine & Parts Co.

5. WILMER NALL and his attorneys have no knowledge of any witness possessing firsthand knowledge and who can testify that WILMER NALL breathed any asbestos fiber from brake linings manufactured by ABEX CORPORATION, the American Brake Shoe Company, the American Brakeblok Co., or the American Brake Manaterials Co.

6. Neither WILMER NALL nor his attorneys has any reports, notes, letters, memoranda or written documents of any kind showing ABEX CORPORATION, the American Brake Shoe Company, the American Brakeblok Co., or the American Brake Materials Co., their management or employees knew before 1982 of any relationship between exposure to asbestos dust from brake linings and health.

7. Neither WILMER NALL nor his attorneys know of any governmental regulation or safety standard violated or not met by ABEX CORPORATION, the American Brake Shoe Company, the American Brakeblok Co., or the American Brake Materials Co. in its manufacture