

such shipments and other information required to indentify
[sic] each such shipment;

(h) The department and officer or employees of
plaintiff's employer who:

- (1) Placed the order;
- (2) Accepted delivery.

(i) The department and officer or employee of
defendant who:

- (1) Accepted the order;
- (2) Packaged the order;
- (3) Shipped the order;
- (4) Has possession at the present time of
the records concerning such shipment.

ANSWER: Abex objects to this interrogatory on the
grounds it is overly broad, unduly burdensome and assumes facts
not yet established. Subject to and without waiving these
objections, invoices which may or may not indicate sales of
asbestos-containing automotive friction products to the plain-
tiff's employer are on file for a period beginning sometime in
1976 to the present only. Such invoices, which number in
excess of 800,000, are arranged for the most part in numerical
and chronological order by year and not by customer, product or
state. These invoices can be made available for inspection and
copying upon receipt of an appropriate document request.

18. With regard to each order of asbestos products
sold, delivered or supplied by defendant to plaintiff's
employer, state whether: