INTERROGATORY NO. 19: Do you have any records or documents indicating that any of your products containing asbestos fibers were sold or distributed to the following company for the years 1945 until the present? D & W Distributing Co. of Pekin, Illinois.

(a) Please identify each document.

(b) Please identify such products sold or distributed and the dates of such sale or distribution.

ANSWER: Defendant Abex objects to this interrogatory as being unduly broad and unlimited. This information is available at Defendant's Winchester, Virginia, facility, and can be retrieved only through a manual search of the files, and it would be unduly burdensome to require Defendant to expend a great many man-hours searching its files for each document. Further Defendant states that the information is available only for the last three years due to Defendant's current records retention procedures, and Defendant states that such records would be irrelevant as Plaintiff, by his own testimony, stopped working with asbestos products in 1975.

James G. Hoflebower
James G. Hoflebower
Accounts Receivable Supervisor
Abex Corporation

Subscribed and sworn to before me this 23rd day of December, 1982.

Marjorie Boaler
NOTARY PUBLIC
My Commission expires March 5, 1984

SWAIN, JOHNSON & GARD
1900 Savings Center Tower
411 Hamilton Boulevard
Peoria, Illinois 61602
(309) 673-0741