

objects to this interrogatory on the grounds that the information or materials it purports to seek other wise lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

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Abex objects to this interrogatory on the grounds that it assumes the truth of matters not established or matters not in evidence.

Abex also objects to this interrogatory on the ground that it seeks to impose upon Abex a legal duty or obligation to which it was not subject.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, Abex discontinued the manufacture and sale of asbestos-containing friction products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all the records and documents that might be responsive to this interrogatory.

The available information, from which Abex would prepare a response to this interrogatory, is contained in files and records maintained by Abex. To prepare a response to this interrogatory would necessitate the preparation or the making of a compilation, abstract, audit, or summary of or from these files and records. No such compilation, abstract, audit, or summary presently exists. The burden and expense of preparing or making such a compilation, abstract, audit, or summary would be substantially the same for plaintiffs as for Abex.