

corporate existence spans a period of almost one hundred years, during which time it underwent numerous changes in its corporate structure, management, headquarters and name.

Subject to and without waiving these objections, Abex responds that it no longer manufactures, distributes or sells asbestos-containing friction materials of any kind. Abex no longer operates any asbestos-containing friction product manufacturing facilities, and no longer employs any persons in this regard.

The existing business records and documents of Abex, which number in excess of ten (10) million and include an estimated three (3) million sales records, are preserved in the order in which they were found. There is no abstract or summary of most records and documents in Abex's possession which may be responsive to this interrogatory. There was never a central corporate filing system of Abex records and documents. Therefore, the burden of deriving or ascertaining the response to this interrogatory is substantially the same for plaintiffs as Abex.

Furthermore, insofar as Abex understands this interrogatory, invoices relating to sales of Abex's asbestos-containing automotive friction products exist for a period beginning sometime in 1976 to 1987, only. Such invoices, which may or may not indicate the information sought in this request, are arranged for the most part numerically and chronologically by year and not by customer, product or state. Abex can provide plaintiffs with a reasonable opportunity for inspection and copying of non-privileged documents which may be responsive to this interrogatory and to which objection is not made through Abex's counsel at a mutually convenient time and at the Abex document storage facility where they are maintained.

INTERROGATORY NO. 8.01:

Has Defendant ever purchased asbestos-containing products from any other Defendant?