

trieved 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; (b) See answer to 11(a); (c) Chrysolite asbestos; (d) See answer to 11(a).

INTERROGATORY NO. 12: From 1945 until the present, has the Defendant sold or distributed materials to any of the named Co-Defendants which were to be used in the manufacture of clutch pads or clutch facings?

ANSWER: To Defendant's knowledge, no.

ANSWER TO INTERROGATORY NO. 13: Not applicable. (See response to Interrogatory No. 12).

INTERROGATORY NO. 14: From 1945 to the present, has the Defendant sold or distributed finished manufactured brake shoes or brake linings to any of the Co-Defendants named in this suit?

ANSWER: Yes.

INTERROGATORY NO. 15: If the answer to Interrogatory No. 14 is yes, please state and answer the following:

(a) Identify each document or record which would indicate the finished brake shoes or brake linings sold or distributed and the Co-Defendant to whom they were sold or distributed.