Abex's lack of personal knowledge is due to the following: Abex discontinued the manufacture and sale of asbestos-containing railroad friction products in 1977 and asbestos-containing automotive 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.

Abex's corporate existence spans a period of more than one hundred (100) years, during which time it underwent numerous changes in its corporate structure, management, headquarters and name. The volume of records generated, and documents accumulated, during that time was enormous. Therefore, no reasonable possibility can exist that Abex has in its possession all such records and documents, or that it otherwise has knowledge of the information contained in all such records and documents.

The existing business records and documents of Abex, which number in excess of seven (7) million (excluding an estimated three (3) million non-railroad sales invoices), are preserved in the order in which they were found. No summary, abstract, or compilation of the contents of the Abex document repository has been prepared and to the best of Abex's knowledge, no such document exists. In the past, Abex has provided parties with a document entitled "Finding Aid." The Finding Aid is not a summary, abstract, or compilation. To the best of Abex's knowledge, it reflects the general nature of the contents of boxes of documents and provided with the intention of affording parties a reasonable opportunity to examine, audit, and inspect the records contained in the repository for purposes of copying or preparing their own abstracts or