

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, invoices relating to sales of Abex's asbestos-containing automotive friction products are on file for a period beginning sometime in 1976 to 1987 only. These invoices, which may reflect sales of Abex's asbestos-containing as well as non-asbestos-containing automotive friction products, number well in excess of half a million. Such invoices, which may or may not reflect sales to the plaintiff's work sites, are arranged, for the most part, numerically and chronologically by year and not by customer, product or state. These invoices can be made available for inspection and copying upon receipt of an appropriate document request.

5. Did Defendant have sales representatives, employees or other agents who sold products listed in response to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories to contractors, builders and/or companies who did work at the job sites listed on Exhibit A? If so, please state:

- (a) The name and last known address of each such sales representative, employee, or other agent and whether they are still employed by Defendant.
- (b) The period of time they acted as your sales representative, employee or agent.
- (c) Their general responsibility at each location.
- (d) Whether that person is still alive.
- (e) The name of the contractor, builder and/or person in each company with whom your representative, employee or agent primarily dealt.
- (f) A list of the specific asbestos-containing brake lining products that your sales representative, employee or agent sold to the