

its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of 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 interrogatory, are arranged for the most part numerically and chronologically by year and not by customer, product or state. Without waiver of these objections, Abex responds that it can provide plaintiff 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 counsel at a mutually convenient time and at the Abex document storage facility where they are maintained.

See also Abex's response to Interrogatory No 8, above.

INTERROGATORY NO. 109:

Identify any and all parties, located within a 200 mile radius of Madison County, Illinois, including, but not limited to, distributors, suppliers or contractors, known by you to have purchased, received, sold, distributed, applied or otherwise used, at any time, any or all of the products listed in response to Interrogatory Nos. 19 and 42.

RESPONSE TO INTERROGATORY NO. 109:

See Abex's response to Interrogatory No. 108, above.

INTERROGATORY NO. 110:

To be redrafted and resubmitted to defendants pursuant to order of the Court.

INTERROGATORY NO. 111:

To be redrafted and resubmitted to defendants pursuant to order of the Court.