(a) The name and last known address of the company or business;

(b) The name of each job site where Defendant's product was marketed, distributed, and/or sold by the company or business;

(c) The name of each person in each company or business with whom Defendant dealt;

(d) Please state the name and quantity of each asbestos-containing brake lining product that was sold to each job site by each company or business;

(e) Please identify all documents relating to the sales of Defendant's asbestos-containing products to each company identified.

ANSWER: Abex objects to this interrogatory on ıe grounds that it is overly broad and burdensome. Subject to and without waiving these objections, even if there were sales of Abex products as indicated in interrogatory No. 4, Abex cannot assert what others did with its products once they bought them.

4.2 Did Defendant sell its asbestos-containing brake lining products to any of the job sites listed on Exhibit A? If yes, please state the following:

(a) As to each job site on Exhibit A to which Defendant sold its asbestos-containing brake lining products, please state:

(i) The name of each asbestos products sold;

(ii) The quantity sold;

(iii) Each date sold.

(iv) The name of each person at each job site with whom Defendant dealt;

(v) Please identify all documents relating to the sales of Defendant's asbestos-containing brake lining products to each job site.