

(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 summaries. There was never a central corporate filing system of Abex records and documents. Therefore, the burden of deriving or ascertaining the answer to this interrogatory, if at all, is substantially the same for plaintiffs as Abex.

There are approximately 200 boxes, many of which comprise of approximately 2,000 - 3,000 pages, that contain the documents from which the answer to this interrogatory may be ascertained or derived, the subject matter of which includes but is not limited to the following:

1. Club Membership, 1980-1981.
2. Asbestos Information Association, 1977.
3. Expense Reports, 1980-1982.
4. Abex News and other miscellaneous publications, 1967-1978.
5. 1970s 1980s, Friction Materials Standard Institute ("FMSI").

Pursuant to Illinois Rules of Civil Procedure, plaintiffs will have a reasonable opportunity to examine, audit, inspect and to make copies, compilations, abstracts, or summaries of these boxes of documents, which will be produced to plaintiffs at Abex's facility in Brooklyn, New