

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 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 15 to 25 boxes, many of which are comprised of approximately