products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex, 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

The available information, from which Abex would prepare a response to this interrogatory, is contained in files and records maintained by Abex To prepare a response to this interrogatory would necessitate the preparation or the making of a compilation, abstract, audit, or summary of or from these files and records. No such compilation, abstract, audit, or summary presently exists The burden and expense of preparing or making such a compilation, abstract, audit, or summary would be substantially the same for plaintiffs as for Abex.

There are approximately 75 boxes, many of which comprise of approximately 2,000 - 3,000 pages, that contain the documents from which the response to this interrogatory may be ascertained or derived, details of which are as follows.

1 Historical material.

2 Promotional material.

3. Product brochures.

Pursuant to the Illinois Code 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 York, where they are maintained in the ordinary course of business, should plaintiffs decide to inspect them