ANSWER: Not applicable.

13. Did you sell raw asbestos or finished asbestos products to the employers of employee plaintiff during or immediately prior to the periods of employment of plaintiff? If yes, identify:

(a) dates of sales;

(b) amounts of sales;

(c) names of finished asbestos containing products sold;

(d) amount of raw asbestos sold;
Invoice records can be attached to answer this interrogatory.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and unduly burdensome. Without waiving and subject to these objections, invoices, which may or may not indicate sales of asbestos-containing automotive friction products to plaintiff's employer(s) are on file for a period beginning sometime in 1976 to the present only. These invoices, which number in excess of 800,000, are arranged, for the most part, numerically and chronologically by year and not by customer, product or state. They can be made available for inspection and copying upon receipt of an appropriate document request.

14. If you have no records of sales earlier than a date identified in your answer to number 13 supra, will you admit that you sold asbestos products to the companies involved during or immediately prior to the employ of plaintiff by said companies?