

Defendant further responds by stating that it currently has such records only for the years 1976 to the present. For prior years it has only summaries which do not reflect in detail the type of products so purchased by Defendant from any co-defendant. See also Answer to Supplemental Interrogatories, No. 2.

2. All invoices, purchase orders, sales records, inventory records, and any other written documents involving the sale or distribution of the Defendant's finished manufactured brake shoes and/or brake linings to any of the named co-defendants in this suit.

RESPONSE: Defendant objects to this interrogatory as overbroad to the extent it requests documents for years other than 1960-1975. Plaintiff's deposition reveals that his exposure to asbestos was limited to the arcing of brake shoes, and such work was performed only from the mid sixties through 1975. Defendant further objects to this request in that it is unduly burdensome in that it is estimated that at least 2 weeks' work would be required to search for the documents requested here, plus costs for reproduction and transportation.

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3. All invoices, purchase orders, sales records, inventory records, and any other written documents involving the purchase