

cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, and to the best of current and reasonably available information and belief, at least some of Abex's friction products carried edge codes but the period of time is unknown. Abex has made a reasonable and good faith effort to obtain the requested information, to the extent that it is not equally available to plaintiffs, by making a good faith search of locations where documents containing this information, if it exists, should be found, and where appropriate, by inquiry to other natural persons or organizations.

Abex's lack of personal knowledge is due to the following: Abex discontinued the manufacture and sale of asbestos-containing railroad friction products in 1977 and asbestos-containing automotive friction 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.

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