

(b) Identify the finished manufactured brake shoes or brake linings sold or distributed, the Co-Defendant to whom they were sold and distributed and the dates such finished manufactured brake shoes or brake linings were sold or distributed.

(c) Identify whether the finished manufactured brake shoes or brake linings sold or distributed contained asbestos and the type of asbestos contained therein (i.e., amosite, chrysolite or crocidolite).

(d) Identify the trade or brand name of the brake shoes and linings sold or distributed.

ANSWER: (a) Defendant Abex objects to this interrogatory as being unduly broad and unlimited. This information is available at Defendant's Winchester, Virginia, facility, and can be retrieved only through a manual search of the files, and it would be unduly burdensome to require Defendant to expend a great many man-hours searching its files for each document. Further Defendant states that the information is available only for the last three years due to Defendant's current records retention procedures, and Defendant states that such records would be irrelevant as Plaintiff, by his own testimony, stopped working with asbestos products in 1975; (b) See answer to 15(a); (c) Chrysolite asbestos; (d) Material would have the Co-Defendant's name or trade name.