SPECIFIC RESPONSES

1. Sales, purchases, installation or delivery records in the possession of, custody of, or subject to the control of Defendant, for all asbestos and asbestos-containing products used, sold, included as a component part of a product unit, manufactured, installed or otherwise distributed by Defendant, in the states (sic) of Texas. (Some examples of such products would be pipecovering, gasket material, packing, oakum, running rope, blankets, loose asbestos, asbestos rockwool, asbestos insulating cement, lagging, block, boiler and/or furnace insulating products, refractory products, wallboard, asbestos sprays, etc.)

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: Abex objects to this request on the grounds that it is vague and ambiguous in that the term "product unit" is undefined. Abex further states that it manufactured none of the items listed in the above request. Subject to and without waiving these objections, invoices relating to sales of Abex's automotive friction products are on file for a period beginning sometime in 1976 to 1987 only. These invoices, which may reflect sales of Abex's asbestos-containing as well as non-asbestos-containing automotive friction products, number well in excess of half a million. Such invoices, which may or may not indicate the sales sought in this request, are arranged for the most part numerically and chronologically by year and not by customer, product or state. These invoices can be made available for inspection and copying at mutually convenient time and place.

2. Sales, purchase or delivery records in the possession of, custody of, or subject to the control of Defendant, for all asbestos and asbestos-containing products manufactured, sold, installed or otherwise distributed by Defendant, to the jobsites and/or employers listed on the