

1 1957-1977, Chicago, Illinois; (Railroad Products
2 Division)

3 1974-Present, Salisbury, North Carolina.

4 (b) Please refer to response to subpart (a), above.

5 (c) OBJECTION. Subpart (c) is objected to on the
6 grounds that the subject interrogatories are propounded under the
7 case caption of Lawrence Kane V. Johns-Manville Corporation,
8 etc., et al. "And All Related Cases." This defendant does not
9 know what the phrase "other defendants" refers to and it cer-
10 tainly does not know the identity of "all defendants" in all
11 actions maintained by the plaintiff firm. Without waiving said
12 objection, and in the spirit of liberal discovery, this defendant
13 will respond that it has sold friction materials to various vehi-
14 cle manufacturers and others.

15 (d) OBJECTION. Subpart (d) is objected to on the
16 grounds that it is overly broad, burdensome, vexatious and har-
17 assing. The burden and expense to this defendant to compile the
18 information sought is not outweighed by the questionable evi-
19 dentiary value of the information sought. Further, the inter-
20 rogatory in its present form requests a compilation or abstract
21 of records which does not exist. Finally, sales records re-
22 specting such information have been maintained only since 1976 by
23 Abex Corporation.

24 (e) OBJECTION. Subpart (e) to Interrogatory No. 4 is
25 objected to on the grounds it is vague, ambiguous and unintelli-
26 gible with respect to the term "compensation paid."

(f) OBJECTION. Subpart (f) is objected to on the
grounds that it is vague, ambiguous and unintelligible with