

7. Any and all price lists, brochures, product manufacturing specifications, catalogs and any and all other written documents concerning brake shoes and/or lining by the co-defendants, for the years 1944 to 1979.

RESPONSE: Defendant objects to this request as overbroad in its inclusion of the period 1944 to 1979; in its inclusion of "any and all other documents concerning brake shoes and/or linings;" and its inclusion of documents of co-defendants. Defendant further objects to a request of "product manufacturing specifications" on the grounds that such documents constitute trade secrets.

8. The names and address of all conferences, seminars, or any type of meeting which the Defendant's agents or employees attended relative to the dangers of exposure to brake shoes and/or linings during the arcing or grinding of such brake shoes and/or linings for the years 1944 to the present.

RESPONSE: Defendant objects to this request because it does not request any document or other tangible thing to be produced.

9. All invoices, purchase orders, sales receipts, inventory records and any other written documents involving the sale or distribution of the Defendant's brake shoes and/or linings to:

- (a) Jack Hymbaugh Chevrolet, Pekin, IL
- (b) Ray Dennison Chevrolet, Inc., Pekin, IL
- (c) S & K Chevrolet Co., Peoria, IL
- (d) Brenkman Oldsmobile Cadillac Co., Pekin, IL
- (e) John Bearce Ford, Washington, IL
- (f) Emerson Pontiac, Pekin, IL
- (g) Scherer Buick, Pekin, IL
- (h) Lewis Pontiac, Pekin, IL
- (i) Fort & Schock Motor Co., Pekin, IL