

years it has only summaries which do not reflect in detail the type of products so purchased by Defendant from any co-defendant.

5. All documents recording any testing done at Pekin Machine and Parts in regard to the level of airborne asbestos at Pekin Machine and Parts for the years 1944 to the present.

RESPONSE: Defendant has no such documents.

6. All correspondence and exchange of documents between or among RAYBESTOS-MANHATTAN, INC., ABEX CORPORATION, THE BENDIX CORPORATION, DELCO, a Division of General Motors Corporation, JOHNS-MANVILLE SALES CORPORATION, JOHNS-MANVILLE CORPORATION, and THIOKOL CORPORATION, in regard to the potential health hazards of the arcing and grinding of brake shoes and/or linings.

RESPONSE: