

17. Sales Documents

Please state whether you have any documents of any kind indicating or reflecting past sales of one or more asbestos-containing products listed in response to interrogatory 14 including, but not limited to, invoices, orders, purchase records, sales records, confirmations, bills of lading, annual or other periodic summaries of sales or orders, accounts payable or accounts receivable records, etc. If so, describe in detail the different types of documents that you have for each such asbestos-containing product, and state the following as to each type of document:

- A. The items of information contained on it (e.g., date of sale, product, quantity, purchaser, shipment location, price, etc.);
- B. The years of sale encompassed by documents still in existence;
- C. The current location of the documents;
- D. Identify the current custodian of the documents, as well as the current employee most familiar with the codes or system used on the documents:

RESPONSE TO MASTER INTERROGATORY 17:

See Preliminary Statement and General Objections.

Subject to and without waiving objections, records of sales of Victor Products to customers are maintained in Illinois. Certain sales records are computerized back to approximately 1972. Prior to that, some sales records are contained on microfilm or microfiche.