

1 responds that it has records regarding sales dating back to 1976,
2 but no summary, compilation or abstract currently exists. Defen-
3 dant is in the process of attempting to abstract the sales re-
4 cords which do exist, which it contemplates will be accomplished
5 by late 1984.

6 INTERROGATORY NO. 22:

7 If the answer to Interrogatory No. 21 is affirmative, please
8 state:

- 9 (a) The name, address and job classification of each
10 individual who currently has possession of such
11 records;
12 (b) The names of each defendant named herein to whom
13 your products have been sold or distributed;
14 (c) The dates of each such sale;
15 (d) The amount and type of materials sold or distrib-
16 uted;
17 (e) Whether defendant manufactured asbestos-containing
18 products for any other business entity but placed
19 labels or logos not belonging to said defendant on said
20 products; and
21 (f) If response to (e) above is in the affirmative,
22 list each such business entity referred to said subsec-
23 tion (sic).

24 RESPONSE:

25 OBJECTION. Interrogatory No. 22 is objected to on the
26 grounds set forth in response to Interrogatory No. 21. The in-
27 terrogatory is further objected to on the grounds that it seeks a
compilation or abstract of records which does not exist.