ANSWER TO INTERROGATORY NO. 55 SUBPARTS (c) through (f)

Abex discontinued the manufacture and sale of asbestos-containing friction products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products with personal knowledge of the information contained in all the records and documents that might be responsive to this interrogatory.

The available information, from which Abex would prepare a response to this interrogatory, is contained in files and records maintained by Abex To prepare a response to this interrogatory would necessitate the preparation or the making of a compilation, abstract, audit, or summary of or from these files and records No such compilation, abstract, audit, or summary presently exists The burden and expense of preparing or making such a compilation, abstract, audit, or summary would be substantially the same for plaintiffs as for Abex.

There are approximately 150 boxes, many of which comprise of approximately 2,000 - 3,000 pages, that contain the documents from which the response to this interrogatory may be ascertained or derived, details of which are as follows

1. Winchester quality control.
2 Production plans
3. Subject files, Friction products division.
4. Blueprints, Friction products division.
5. General correspondence

Pursuant to the Illinois Code of Civil Procedure, plaintiffs will have a reasonable