

- (a) Dates of sales;
- (b) Amounts of sales;
- (c) Names of finished asbestos containing products sold;
- (d) Amount of raw asbestos sold;

Invoice records can be attached to answer this interrogatory.

ANSWER TO INTERROGATORY NO. 13: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects to the term "asbestos products." Abex never manufactured "asbestos products," but rather automotive friction products, some of which contained chrysotile asbestos as one of their components. Subject to and without waiving these objections, invoices reflecting sales of Abex's asbestos-containing automotive friction products are on file for a period beginning sometime in 1976 to 1987 only. Such invoices, which number in excess of 800,000, are arranged, for the most part, numerically and chronologically by year and not by customer, product or state. These invoices can be made available for inspection and copying upon receipt of an appropriate document request.

14. If you have no records of sales earlier than a date identified in your answer to number 13 supra, will you admit that you sold asbestos products to the companies involved during or immediately prior to the employ of plaintiff by said companies?