

1 INTERROGATORY NO. 122:

2 If the answer to any part of Interrogatory No. 123 is af-
3 firmative, please:

4 (a) State the date(s) during which defendant's automo-
5 bile brake linings or brake assemblies were sold or distributed
6 to each entity;

7 (b) State the quantity and type, including trade or
8 brand name, of defendant's automobile brake linings or brake
9 assemblies sold or distributed to each entity;

10 (c) Identify and produce all documents relating to the
11 sale of defendant's automobile brake linings or brake assemblies
12 to each entity;

13 (d) Identify each person within defendant's company
14 having knowledge of sales and distributions to each entity.

15 RESPONSE:

16 Initially defendant assumes for purposes of this response
17 that a typographical error exists in referencing Interrogatory
18 No. "123" rather than "121." Assuming No. "121" was meant to be
19 referenced, defendant objects to the interrogatory on the grounds
20 that it is overly broad, burdensome, oppressive, vexatious and
21 harassing and seeks a compilation of records which does not
22 exist. This defendant has records pertaining to sales dating
23 back only to 1976. Without waiving said objection, and in the
24 spirit of liberal discovery, defendant responds that at the
25 present time, based upon the data that it has been able to
26 reconstruct from past years, it supplied original equipment brake
27 linings as indicated below. The information provided is subject
to revision as further information should become available.

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