

formulae have been used for Abex's asbestos-containing automotive friction products depending on, among other things, the specific application of the product.

4. Have any of Defendant's asbestos-containing products as listed in response to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories ever been marketed, distributed, and/or sold by any other company or business in Illinois? If so, please state the name and last known address of each of those companies or businesses.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Abex further objects on the grounds that, in seeking information concerning products to which the plaintiff does not allege her decedent was exposed, this interrogatory lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, invoices relating to sales of Abex's asbestos-containing automotive friction products are on file for a period beginning sometime in 1976 to 1987 only. These invoices, which may reflect sales of Abex's asbestos-containing as well as non-asbestos-containing automotive friction products, number well in excess of half a million. Such invoices, which may or may not reflect sales as indicated in this interrogatory, 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.

4.1 For each company or business listed in response to Interrogatory No. 4 above, please state whether they sold Defendant's asbestos-containing brake lining products to any of the job sites listed on Exhibit A? If yes, please state the following: