

protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Subject to and without waiving these objections, and insofar as Abex understands this request, see objections and response to Interrogatory No. 19.

REQUEST FOR PRODUCTION NO. 11:

Please produce a true and correct copy of all tests which Defendant conducted and/or has in its possession to determine potential health hazards involved in the use of or exposure to asbestos products listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 21 propounded to Defendant in this litigation).

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

See General Objections. Abex further objects to this request on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, speculative and repetitive.

Objection is made to this request on the ground that the terms "potential health hazards," "use" and "exposure" are undefined or insufficiently defined, and call for speculation.

Subject to and without waiving these objections, and insofar as Abex understands this request, see objections and response to Interrogatory No. 21

REQUEST FOR PRODUCTION NO. 12:

Please produce a true and correct copy of all studies which Defendant conducted or caused to be conducted concerning the effects of the inhalation of asbestos dust and/or fibers in workers or other persons using, working with and/or around, installing and/or applying any of the asbestos products mined, manufactured, sold, distributed, marketed, installed and/or relabelled for distribution by Defendant or Defendant's predecessor (this Request for Production relates to Plaintiffs' Interrogatory No. 22 previously propounded to Defendant in this litigation).

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

See General Objections. Abex further objects to this request on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, speculative and repetitive.

Objection is made to this request on the ground that the terms "studies," "effects," "inhalation," "asbestos," "asbestos dust," "dust," "asbestos . . . fibers," "other persons," "using,"