

Abex further objects to this request on the ground that it assumes the truth of matters not established or matters not in evidence.

Abex further objects to this request on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent to which it requests knowledge, information or materials which are not within the personal possession or control of Abex, its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of Abex.

Subject to and without waiving these objections, see objections and response to Request For Production No. 1, above.

REQUEST FOR PRODUCTION NO. 30:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Industrial Health Foundation or the Industrial Hygiene Foundation in the custody, possession or control of Defendant.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

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

Abex further objects to this request on the ground that it purports to shift the burden of establishing causation from plaintiffs to Abex.

Abex further objects to this request on the ground that it assumes the truth of matters not established or matters not in evidence.

Abex further objects to this request on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent to which it requests knowledge, information or materials which are not within the personal possession or