

Abex further objects to this interrogatory to the extent to which it seeks information regarding time periods and products that are not at issue in this case on the ground that such information lacks relevance, and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the ground that the information it seeks otherwise lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence.

Abex also objects to this interrogatory on the ground that the terms "usage," "tests," "said products," "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 interrogatory, see objections and response to Interrogatory No. 8, above.

INTERROGATORY NO. 19:

Does Defendant have or control any documents, including but not limited to, written memoranda, specifications, recommendations, blueprints or other written materials of any kind or character relating to the testing of the products listed in Interrogatory No. 5 hereinabove (sic)?

- (a) Identify each such written material or document;
- (b) Identify each person who presently has possession of each such document;
- (c) State where each such document is located.

RESPONSE TO INTERROGATORY NO. 19:

See General Objections. Abex further objects to this interrogatory on the ground that it is repetitive.

Abex further objects to this interrogatory on the ground that the terms "other written materials" and "testing" are undefined or insufficiently defined, and call for speculation.

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