

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory to the extent this interrogatory seeks information regarding safety issues at Abex or Abex plants where asbestos-containing and non-asbestos-containing products were manufactured, on the grounds that this interrogatory is overly broad and irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence, in that any exposure under such conditions would differ in quality, type, duration, and degree from any exposure at issue in this action. In addition, this interrogatory is overly broad and irrelevant as the information sought is not in any way limited in time or to activities which transpired in Illinois or to the alleged exposure of the plaintiff to any product of Abex.

Abex also objects that this request may call for information subject to the attorney-client privilege, protected by the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Furthermore, Abex responds that it had no control of job sites or job site workers where its asbestos-containing friction products may have been present. Therefore, upon information and belief, Abex is not aware of any information indicating that it undertook or financed tests or studies at job sites.

Abex further objects to this interrogatory 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 information which is not within the personal knowledge, possession or control of Abex,