not expressly set forth in the Illinois Code of Civil Procedure.

B. Abex further objects to these interrogatories on the grounds that they are burdensome, overbroad and harassing in that they request information which is not within the personal knowledge, possession or control of Abex, its employees or agents, or which can be ascertained or derived only from a page-by-page review of the existing voluminous documents and records of Abex. Many of the interrogatories call for Abex to provide answers concerning events and records without any limitation as to time. There is no compilation, abstract, index or summary of most records in Abex's possession which may be responsive to these interrogatories, and the burden of deriving or ascertaining the answer to most interrogatories is substantially the same for plaintiff as for Abex. Consequently, the entire set of interrogatories is overly broad, unduly burdensome, oppressive and harassing, and beyond the scope of proper discovery.

C. Abex further objects to these discovery requests on the grounds that even if it were possible to supply such detailed and voluminous information, the process of doing so would be unduly burdensome to Abex and would not further plaintiff's discovery of information that would be relevant to the subject matter of the claims in this action. In addition, Abex objects that these requests are overbroad and irrelevant because 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. The interrogatories have been propounded indiscriminately to every defendant without any attempt to tailor them to any individual defendant.

D. Abex generally objects to these interrogatories on the grounds that they are unduly burdensome, oppressive, vague, overly broad as to time, scope and location, lack particularity, and are repetitive. The use of the words "any," "all" and "each" is overly broad and is objected. Abex cannot determine the precise nature of the information sought and, therefore, is required to respond or cannot respond without an unreasonable risk of inadvertently providing a misleading, confusing, inaccurate, or incomplete response.

E. To the extent that these interrogatories seek information regarding alleged potential health risks to individuals who worked at plants where Abex's asbestos-containing automotive friction products were manufactured, Abex objects on the grounds that such information is not relevant to this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to these interrogatories to the extent that they make no distinction among exposure to raw asbestos fibers, exposure to asbestos-containing building products and exposure to asbestos-containing automotive friction products.

F. Many of these interrogatories call for Abex to characterize the state of knowledge or awareness of a corporation at any given time with regard to a particular fact, event or subject. Abex can only respond to such interrogatories, if at all, by stating on information and belief the degree of knowledge of a particular fact, event or subject as held by a person at a specific time. Such answer, if given, is not intended and should not be deemed to constitute an acknowledgment by Abex that such knowledge is attributable to it.