

its asbestos-containing automotive friction products. Furthermore, Abex does not have specific information concerning which advertising agents may have been employed to promote its products.

However, documents generally meeting the description of promotional and advertisement materials can be made available for inspection and copying through Abex's counsel at a mutually convenient time at the facilities where they are maintained. See also objections and response to Request For Production No.1, above.

REQUEST FOR PRODUCTION NO. 17:

Please produce a true and correct copy of all warnings, cautions, caveats or directions concerning the possible health effects of the products listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 41 previously propounded to Defendant).

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

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

Objection is made to this request on the ground that the terms "possible health effects" and "directions" are undefined, and call for speculation.

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

Abex further objects to this request 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 request 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.