

product doctrine, the investigative privilege or the party communication privilege. Abex further objects to this request on the grounds that it seeks materials not relevant to this case and not reasonably calculated to lead to the discovery of admissible evidence.

18. All annual reports, financial statements or other formal corporate reports including accounting notes required under U.S., British or Canadian law for Defendant between 1960 and present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18 : These materials, to the extent they exist, are a matter of public record.