

that such materials are equally available to plaintiff as to defendant Abex.

10. Any and all communications either received by Defendants from Dr. Irving Selikoff and/or Mt. Sinai or transmitted by Defendants to Dr. Irving Selikoff and/or Mt. Sinai prior to the publication of Dr. Irving Selikoff's article, "Asbestosis Exposure and Neoplasia," JAMA 188:142 (1963).

RESPONSE TO REQUEST FOR PRODUCTION NO. 10: Abex is currently not aware of any documents responsive to this request for production.

11. Any and all communications either received by you from or transmitted by you to Dr. Irving Selikoff after 1963, regarding the relationship between asbestos and disease.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11: Abex is currently not aware of any documents responsive to this request for production.

12. Any and all documents, including, but not limited to, preliminary and/or executed agreements, between you, Dr. Irving Selikoff, Mt. Sinai, any of the Defendants in this action and/or any trade associations, corporations or other business entities, relating to scientific research or studies to be performed, equipment (sic) and/or funding to be supplied, publications or non-publication of data, results, findings and/or opinions, relating to asbestos.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12: Abex objects to this request on the grounds it is vague, ambiguous and lacks particularity as to what information is requested. Abex further objects to this request on the grounds that this request seeks information or materials prepared in the course of litigation or which is otherwise protected by the attorney-client privilege, the work product doctrine, the investigative privilege or the party communication privilege. Subject to and without waiving these objections, Abex is currently not aware of any