

otherwise subject to the attorney-client privilege, the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

REQUEST FOR PRODUCTION NO. 24:

Please produce a true and correct copy of all notices received by Defendant prior to 1968 that any person was claiming an injury or had sustained an abnormal x-ray reading as a result of using asbestos-containing products, regardless of the manufacturer or seller of the products.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

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

Objection is also made to this request on the ground that the terms "injury," "using" and "asbestos-containing products" are undefined, and call for speculation.

Objection is made to this request on the ground that the term "notices" calls for a legal opinion or conclusion which Abex is unqualified to render.

Abex further objects to this request on the ground that the term "abnormal" is undefined or insufficiently defined, overly broad, vague, and calls for speculation, which renders this request incomprehensible.

Abex further objects to this request on the ground that it purports to seek information about entities other than Abex.

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

Abex further objects to this interrogatory to the extent that it seeks confidential information regarding the medical condition of individuals without providing a specific authorization for release of this information.