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2 burdensome, oppressive and overly broad as to time, scope and
3 location, lack particularity, and are repetitive. The use of
4 the word "any" and "all" is overly broad and is objected to.
5 Objection is also made to the extent these Interrogatories as-
6 sume the truth of facts not in evidence, and on the grounds that
7 they seek information which is not relevant to the subject mat-
8 ter of the action and not reasonably calculated to lead to the
9 discovery of admissible evidence.

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11 Objection is also made to these Interrogatories to the
12 extent that they seek privileged, confidential, or proprietary
13 "trade secret" or other information or materials which have been
14 gathered or prepared in the course of the asbestos litigation,
15 or which is otherwise subject to the attorney-client privilege,
16 the attorney work-product privilege, the rule protecting materi-
17 als prepared in anticipation of and/or in connection with
18 litigation, or any other applicable privilege.

19 Abex objects to plaintiff's Definitions as set forth
20 in the Interrogatories, and to each and every interrogatory to
21 which any of such definitions are applicable, upon the ground
22 that plaintiff by such definitions purports to call upon Abex to
23 answer otherwise than as required by the provisions of the Code
24 of Civil Procedure and upon the further ground that the Inter-
25 rogatories are by reason of such definitions rendered overly
26 broad, unduly burdensome, oppressive, harassing, shotgun, vexa-
27 tious and boilerplate in nature, and purport to call for infor-