

Abex further objects to this interrogatory to the extent to which it purports to seek information that has been gathered, received or prepared in the course of the asbestos litigation, or which is 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.

Subject to and without waiving these objections, and insofar as Abex understands this interrogatory, upon information and belief, Abex responds: No.

INTERROGATORY NO. 47.1:

Please identify all documents concerning or in any way related to any decisions made by you to cease manufacturing asbestos-containing products.

RESPONSE TO INTERROGATORY NO. 47.1:

See General Objections. Abex further objects to this interrogatory on the grounds that it is over broad and unduly burdensome.

To the extent to which it seeks information concerning time periods and products which are not at issue in this case, this interrogatory is objected to on the ground that such information is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory 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.

Objection is made to this interrogatory on the ground that it assumes the truth of matters not established or matters not in evidence.

Subject to and without waiving these objections, see objections and response to Interrogatory No. 8, above.