

Abex also objects to this interrogatory on the ground that it is speculative inasmuch as it fails to distinguish among raw asbestos, asbestos contained in building insulation products and/or asbestos-containing automotive friction products, and/or among the different types of asbestos fibers. Because the asbestos fiber contained in Abex's asbestos-containing automotive friction products was chrysotile, the only type of asbestos Abex ever used for product production, which was resin-bonded and encapsulated, proper use of such products did not create or contribute to any adverse health effects.

Abex further objects to these interrogatories on the grounds that they are overly broad, oppressive, harassing and unduly burdensome and call for speculation to the extent to which they request information or materials which are not within the personal knowledge, possession or control of Abex, its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of Abex. Therefore, the burden of deriving or ascertaining the answers to these interrogatories, if at all, is substantially the same for plaintiffs as Abex.

Abex objects to these interrogatories to the extent to which they purport to seek information or materials that have been gathered, received or prepared in the course of litigation, or which are otherwise subject to the attorney-client privilege, protected by the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege

The answers of Abex hereinafter set forth are limited to providing information concerning domestic automotive and railroad friction products by Abex for the allegedly relevant