

records do not confirm any such agreement, nor do Abex records reflect any such payment.

14. Any and all documents which exist either in the files of the answering Defendant or which have come into the possession of the Defendant as a result of other proceedings of "asbestos litigation," that represent communications between any of the Defendants to this action, other manufacturers, suppliers or distributors of asbestos products, the United States Government, trade organizations, including, but not limited to, Asbestos Textile Institute, Industrial Hygiene Foundation, National Insulation Manufacturers Association, Asbestos Information Association, National Insulations Contractors Associations, Sprayed Mineral Fibers Manufacturers Association, Asbestos Cement Producers Association, Mineral Fibers Products Bureau, Gypsum Association, Vermiculate Institute, or scientific or medical foundations, such as Saranac Lake Laboratory or Mt. Sinai School of Medicine.

(a) Discussing the possible relationship between asbestos exposure and asbestosis, lung cancer, mesothelioma and/or other diseases;

(b) Medical or scientific studies concerning the relationship between asbestos exposure and asbestosis, lung cancer, mesothelioma and/or other diseases.

(c) Discussing the publication or non-publication of any medical or scientific findings concerning such relationship.

(d) Discussing warnings, safety equipment, or other preventative measures designed to prevent injuries resulting from exposure to asbestos.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14: Abex

objects to this request on the grounds that it is overly burdensome. Abex further objects on the grounds 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. Abex also objects to this request to the extent it seeks information concerning the working conditions of Abex employees on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.