

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, see objections and response to Interrogatory No. 22, above.

INTERROGATORY NO. 48:

Did Defendant receive notice prior to 1968 that any person was claiming injury or had sustained an abnormal x-ray reading as a result of using asbestos products manufactured, sold, installed, and/or distributed by Defendant? If so, please state:

- (a) The name and address of each claimant;
- (b) The date of notice of each claim;
- (c) A description of the claim;
- (d) The type of injuries allegedly sustained;
- (e) The name and address of each attorney representing the individuals making such claims;
- (f) The style and court number of each such claim;
- (g) The resolution of each claim.

RESPONSE TO INTERROGATORY NO. 48:

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

Abex further objects to this interrogatory on the ground that the terms "injury," "using" and "distributed" are undefined or insufficiently defined, and call for speculation.

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

Objection is made to this interrogatory on the ground that the term "notice" is argumentative, and calls for a legal opinion or conclusion which Abex is unqualified to render.