

contained in the repository for purposes of copying or preparing their own abstracts or summaries. There was never a central corporate filing system of Abex records and documents. Therefore, the burden of deriving or ascertaining the answer to this interrogatory, if at all, is substantially the same for plaintiffs as Abex.

There are approximately 15 to 25 boxes, many of which are comprised of approximately 2,000 to 3,000 pages, that contain the documents from which the answer to this interrogatory may be ascertained or derived, the subject matter of which includes but is not limited to the following:

1. Medical Department Records.

Pursuant to Illinois Rules of Civil Procedure, plaintiffs will have a reasonable opportunity to examine, audit, inspect and to make copies, compilations, abstracts, or summaries of these boxes of documents, which will be produced to plaintiffs at Abex's facility in Brooklyn, New York, where they are maintained in the normal course of business, should plaintiffs decide to inspect them.

Abex has no comprehensive list or log of the documents with respect to which it claims privilege. In the past, when Abex has had cause to review some boxes of documents, it has segregated and/or tagged certain documents with respect to which it claims privilege. The best specificity that Abex can presently provide as to the documents with respect to which it claims privilege is as follows: Documents passing between Abex and/or its predecessors or divisions, on the one hand (collectively "Abex"), and their attorneys, both outside and inhouse counsel, on the other hand, as well as documents prepared at the request of, or for the benefit of such counsel or setting forth mental impressions of the attorneys on matters concerning Abex. These