

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.

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Abex 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.

Subject to and without waiving this additional objection, any tests conducted by Abex on its asbestos-containing automotive friction products would have been quality control tests to ensure that Abex's asbestos-containing automotive friction products performed their intended task of slowing or stopping a moving vehicle. Any further information or materials related to performance tests lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Further, upon information and belief, Abex discontinued the manufacture and sale of asbestos-containing friction products in 1987 and no longer operates any friction product manufacturing facilities. There are no current Abex employees, officers who worked for Abex, or directors who sat on its Board during the period Abex manufactured and sold friction products