

management; as well as other legal issues, transactions and claims.

When a plaintiff avails himself or herself of the offer to inspect the documents, Abex will remove any documents with respect to which it claims privilege, on a box-by-box basis, and will prepare and serve a privilege log on plaintiff within sixty (60) days after the last date upon which the documents were inspected. Any dispute as to the propriety of any objection can thereafter be resolved by the Court.

INTERROGATORY NO. 78: Did Defendant, any predecessor or any related company, at any time, directly advise the owners or management employees of any worksite in which it sold or applied any product listed in response to interrogatory Nos. 19 and 43, of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienist? If so, state the date or dates that you so advised each such owner or employees, the manner in which you advised such owner or employee and the name of each such owner or employee.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 78:

Abex objects to this interrogatory on the grounds that it is over broad, unduly burdensome, compound, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory to the extent it purports to seek information or materials regarding time periods and products that are not at issue in these cases, on the grounds that such information or materials lack relevance and are not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the grounds that the information or materials it purports to seek lack relevance to the issues arising in these cases and are not calculated to lead to the discovery of admissible evidence.

Abex objects to this interrogatory on the ground that it purports to seek information regarding entities other than Abex.

Abex also objects to this interrogatory to the extent to which it purports to seek