

documents responsive to this request for production. Subject to and without waiving these objections, see answer to request No. 13.

13. Any and all documents concerning contributions to or summarizing findings or results of any studies or test performed by the Saranac Lake Laboratory or the Trudeau Foundation relating to asbestos exposure and its effects upon human life.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13: Abex

objects to this request on the grounds that it 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 further 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. Subject to and without waiving these objections, Abex is generally aware that it contributed monies for certain studies at the Saranac Laboratory, Saranac, New York. Abex documents reflect that any such studies performed by the Saranac Laboratory on behalf of Abex specifically pertained to siderosis and silicosis studies. Plaintiffs' counsel have produced in discovery unauthenticated photocopies of documents purporting to show that Abex agreed in the 1930's to pay \$250 per year for three years with respect to a single asbestos-related study at the Saranac Laboratory. Abex