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 documents, include, but are not limited to, correspondence, memoranda, notes of telephone conversations and other records relating to workers' compensation and personal injury issues, claims and litigation (asbestos and non-asbestos related); environmental issues, claims and litigation; insurance coverage issues, claims and litigation; real estate issues, claims and litigation; real estate and business transactions; labor and employment issues, claims and litigation; anti-trust issues, claims and litigation; legal issues related to corporate governance or management; as well as other legal issues, transactions and claims.

When plaintiffs avail themselves 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 plaintiffs 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.

In addition, see Answer to Interrogatory Nos. 79 and 98.