

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 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. 94: Identify any and all trade organizations, associations, or other entities, including but not limited to American Textile Institute (ATI), Asbestos Information Association (AIA), Industrial Health Foundation or Industrial Hygiene Foundation (IHF), National Insulation Manufacturers Assn. (NIMA), National Insulation Contractors Assn. (NICA), National Safety Council (NSC), American Ceramics Society (ACS), National Building Materials Distributors Assn. (NIA), Sprayed Mineral Fiber Manufacturers Assn. (SMFMA), Thermal Insulation Manufacturers Assn. (TIMA), Quebec Asbestos Mining Assn. (QAMA), to which Defendant, any predecessor or any related company has belonged or in which any or all of the same have participated since 1925, and state the applicable dates of such membership or participation.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 94:

Abex objects to this interrogatory on the grounds that it is over broad, unduly