

- (e) identify by deponent and date all individuals who were deposed in these cases;
- (f) identify by date, author and recipient(s) all documents that have been placed on a protective order in such litigation;
- (g) identify all expert witnesses retained for use at trial in any of the above litigation by name, address and telephone number.

RESPONSE TO INTERROGATORY NO. 56.1:

See General Objections. Subject to and without waiving these objections, see objections and response to Interrogatory No. 56, above.

INTERROGATORY NO. 57:

Please state the name and address of each person who has knowledge of relevant facts regarding claims and defenses of this lawsuit.

RESPONSE TO INTERROGATORY NO. 57:

See General Objections. Abex further objects to this interrogatory on the grounds that it is speculative and premature.

Objection is also made to this interrogatory on the ground that the term "relevant" calls for a legal opinion or conclusion which Abex is unqualified to render.

Abex further objects to this interrogatory on the ground that it is premature. Discovery and investigation are continuing.

Abex also objects to this interrogatory on the ground that it purports to seek information or materials which have been gathered, received or prepared in the course of the asbestos litigation, or which are otherwise subject to the attorney-client privilege, the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Subject to and without waiving these objections, Abex expressly reserves the right to supplement or amend this response, as appropriate.