

discovery of admissible evidence. Abex further objects to this request on the ground that the information it seeks otherwise lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this request to the extent this interrogatory seeks information regarding safety issues at Abex plants where asbestos-containing and non-asbestos-containing products were manufactured, on the grounds that this interrogatory is overly broad and irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this request on the ground that it assumes the truth of matters not established or matters not in evidence.

Abex further objects to this request on the grounds that it is overly broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent to which it requests knowledge, information or materials which are not within the personal possession or control of Abex, its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of Abex.

Abex further objects to this request to the extent to which it purports to seek information which has been gathered, received or prepared in the course of litigation, or which is otherwise protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege.

Subject to and without waiving these objections, see objections and response to Request For Production No. 1, above.