

REQUEST FOR PRODUCTION NO. 29:

Please produce a true and correct copy of all safe workplace practices manuals, pamphlets or brochures issued by Defendant from 1900 through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

See General Objections. Abex further objects to this request on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, speculative and repetitive.

Objection is made to this request on the ground that the terms "safe," and "workplace" are undefined, and call for speculation.

Abex further objects to this request on the ground that it purports to shift the burden of establishing causation from plaintiffs to Abex.

Abex object to this request to the extent to which it seeks information regarding time periods, products and work sites that are not at issue in this case on the ground that such information lacks relevance, and is not reasonably calculated to lead to the discovery of admissible evidence. To the extent to which it seeks information regarding the working conditions of Abex employees, this request is objected to on the ground that such information 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 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.