

RESPONSE TO INTERROGATORY NO. 48.3:

See General Objections. Objection is made to this interrogatory to the extent to which 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, protected by the work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

INTERROGATORY NO. 48.4:

For all invoices, work orders and/or purchase orders, which relate to matters relevant to the all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, word processing or other computerized format)?
- (e) What manner of electronic format is used?

RESPONSE TO INTERROGATORY NO. 48.4:

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

Subject to and without waiving this objections, see objections and response to Interrogatory No. 8, above.

INTERROGATORY NO. 49:

Has Defendant obtained statements from any witnesses including the Plaintiffs? If so, please:

- (a) list each witness who has given a statement and the name, address, and job title of each person having custody of any such statement.