

Objection is also made to this interrogatory on the ground that the terms "the like," "asbestos," "risks" and "historical information" are undefined, and call for speculation.

Objection is made further to this interrogatory on the grounds that the terms "legally responsible" and "past torts" are argumentative, and call for a legal opinion or conclusion which Abex is unqualified to render. Abex further objects to this interrogatory on the ground that it otherwise calls for a legal opinion or conclusion which Abex is unqualified to render.

To the extent to which it seeks information concerning time periods and products which are not at issue in this case, this interrogatory is further objected to on the ground that such information is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the ground that 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.

Objection is also 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 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 an/or in connection with litigation, or any other applicable privilege.

Subject to and without waiving these objections, and insofar as it understands this interrogatory, Abex responds that the former Abex Corporation, Pneumo Abex Corporation's predecessor, was incorporated as the American Brake Shoe and Foundry Company in New Jersey in 1902, and was reincorporated as that company in 1916 in Delaware. In 1926, the American Brake Shoe and Foundry Company caused to be incorporated a New York corporation named American Brake Materials Corporation. In 1933, American Brake Materials Corporation changed its name to American Brakeblok Corporation. In 1937, American Brakeblok