

encapsulated, proper use of such products did not create or contribute to any adverse health effects.

Abex further objects to this interrogatory to the extent to which it purports to seek information or materials that have been gathered, received or prepared in the course of litigation, or which are otherwise subject to the attorney-client privilege, protected by 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, and insofar as Abex understands this interrogatory:

With respect to the manufacture of those products identified in response to Interrogatory No. 19, see Answer to Interrogatory No. 54.

With respect to the use, application, and installation of those products identified in response to Interrogatory No. 19, upon information and belief, no.