

IN RE: ASBESTOS LITIGATION)	IN THE DISTRICT COURT
)	352ND JUDICIAL DISTRICT
)	TARRANT COUNTY, TEXAS
)	
)	
)	

ABEX CORPORATION'S ANSWERS TO
MASTER DISCOVERY REQUESTS

INTRODUCTION AND GENERAL OBJECTIONS

Abex Corporation ("Abex") by and through its attorney of record generally objects to these interrogatories and requests for production of documents to the extent they seek trade secret information and/or materials or information prepared in the course of litigation or otherwise subject to the attorney-client privilege, the attorney work-product doctrine, the investigative privilege, the party communication privilege and the trade secret privilege. Abex further objects to these discovery requests to the extent they seek information regarding alleged potential health risks to individuals who worked at plants where Abex's asbestos-containing automotive friction products were manufactured on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

Abex also objects to these discovery requests to the extent that they make no distinction among exposure to different types of raw asbestos, exposure to asbestos-containing building

