

in these cases and are not reasonably calculated to lead to the discovery of admissible evidence. Abex objects to this interrogatory on the grounds that the information or materials it purports to seek otherwise lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Abex also 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, Gordon S. Siegel, M.D., Chief of the Occupational Medicine Section, Division of Occupational Health, Department of Health, Education and Welfare of the U.S. Public Health Service in Washington, D.C., in 1965, prepared to embark on a 20-year study entitled, "Occupational Health Study of the Asbestos Products Industry in the United States." As part of the study, all employees of Abex who worked or would be hired at the Winchester, Virginia facility were to be surveyed. Information currently available to Abex indicates that this study was terminated by the Government before it was concluded. To the best of current knowledge and belief, Abex has found no such documents or any record of having received such documents. Abex has made a reasonable and good faith effort to obtain the requested information, to the extent that it is not equally available to plaintiffs, by making a good faith search of locations where documents containing this information, if it exists, should be found, where appropriate, by inquiry to other natural persons or organizations.