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

Abex further objects to this interrogatory to the extent to which it purports to seek information that has been gathered, received or prepared in the course of the asbestos litigation, or which is otherwise subject to the attorney-client privilege, the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

INTERROGATORY NO. 53:

Does Defendant expect to call expert witnesses at the trial of this case? If so, please state the following:

(a) Their identity and last known address;

(b) The subject matter on which the expert is expected to testify;

(c) The expert's specific conclusion and specific opinions and the specific basis therefore;

(d) The expert's qualifications to render the opinions set forth above;

(e) Whether any person identified in sub-paragraph (a)above has provided a report or other documentation to you, and if so, identify such document or report;

(f) Identify all documents that you have provided to each person identified in response to sub-paragraph (a) above; and

(g) Describe in detail the education and work history of, and identify any books, treaties, article, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answer.