

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

See General Objections. Abex further objects to this request on the grounds that it is overly broad and unduly burdensome.

Abex further objects to this request on the ground that the information it seeks lacks relevance to the issues arising in this case, and is not calculated to lead to the discovery of admissible evidence.

Abex further objects to this request on the ground that it purports to seek information that is a matter of public record and, thus, equally available to plaintiffs as Abex.

REQUEST FOR PRODUCTION NO. 28:

Please produce the originals or true and correct copies of all safety or health manuals, pamphlets or brochures issued by Defendant between 1930 and the present and any documents relating to whom said manuals were issued.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

See General Objections. Abex further objects to this request on the grounds that it is overly broad, unduly burdensome, compound, vague, ambiguous and speculative.

Objection is also made to this request on the ground that the terms "safety" and "health" are undefined, and call for speculation.

Abex further objects to this request on the ground that it purports to shift the burden of establishing causation from plaintiffs to Abex.

Abex further objects to this request to the extent to which it seeks information regarding time periods, products and work sites 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. To the extent to which it seeks information regarding the working conditions of Abex employees, this request is objected to on the ground that such information lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the