15. Any and all documents identified in, or relating to, each of the Interrogatories which have been provided to you in this case by Plaintiffs herein.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15: Abex objects to this request on the grounds that it is overly broad. Subject to and without waiving these objections, relevant, responsive documents, to which objection has not already been asserted in the answers to interrogatories, can be made available to inspection and copying at a mutually convenient time and place.

16. Copies of all reports of Defendants' experts and any and all documents relied upon or reviewed by such experts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16: Abex objects to this request on the grounds that it seeks information or materials prepared from consulting experts. Subject to and without waiving this objection, to the extent they exist, Abex can make the requested documents available at a mutually convenient time and place.

17. All minutes, reports or other documents concerning meetings of Defendant's Board of Directors or other corporate committees or subcommittees in which the subjects of: (1) acquiring or divesting entities which produced, marketed, installed, removed or distributed asbestos-containing products; (2) the hazards of asbestos or the safety of Defendant's insulation or asbestos-containing products; or (3) Defendant's potential liability from the insulation or asbestos-containing products sold, installed, marketed or distributed by Defendant or its predecessors or affiliated entities were discussed.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17: Abex objects to this request on the grounds that it seeks information or materials prepared in the course of litigation or which is otherwise protected by the attorney-client privilege, the work