

Abex can only respond to such interrogatories, if at all, by stating on information and belief the degree of knowledge of a particular fact, event or subject as held by a person at a specific time. Such response, if given, is not intended and should not be deemed to constitute an acknowledgment by Abex that such knowledge is attributable to it.

H. Objection is also made to these interrogatories to the extent that they seek information or materials which have been gathered 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. Abex further objects to these interrogatories to the extent these interrogatories seek or make inquiry into confidential, proprietary or trade secret information or materials.

I. Abex objects to these interrogatories on the ground that they seek information from and identification of each and every person with knowledge of a particular fact, event or subject matter and as such these interrogatories are overly broad, unduly burdensome, oppressive and harassing. The interrogatories are complex and vague and have overlapping subject matters. Hundreds of persons may have knowledge of some of the subjects into which inquiry is made. In other cases the subjects are too ill-defined to allow specification of persons with knowledge. Many of the persons who have or may have had knowledge of particular facts, events or subject matters of which inquiry is made are now deceased or cannot be located. Others, although they may be located, are not presently in the employ or under the control of Abex and cannot be compelled to assist in the preparation of responses to these interrogatories. Moreover, due to the extensive time covered by these interrogatories, in some instances open-ended, the persons who may have had knowledge of a particular fact or event may not be able to recall the extent of their knowledge, the source of such knowledge or the time at which such knowledge was acquired.