

given time with regard to a particular fact, event or subject. Abex can only respond to such requests and 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.

Objection is also made to the extent these discovery requests assume the truth of matters not established, and on the grounds that they seek information which is not relevant to the subject matter of this lawsuit and not reasonably calculated to lead to the discovery of admissible evidence. Objection is further made to the extent that no period of time is specified for which information is sought, thus rendering the requests and interrogatories hopelessly overbroad.

Objection is also made to these requests and interrogatories to the extent that they seek information or materials which have been gathered or prepared in the course of the asbestos litigation, or which is 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 discovery requests to the extent these discovery requests seek or make inquiry into confidential, proprietary or trade secret information or materials. Abex acknowledges and recognizes