

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

See General Objections. Subject to and without waiving these objections, see objections and response to Request For Production No. 32, above.

REQUEST FOR PRODUCTION NO. 35:

Please produce a true and correct copy of all documents relating to any conferences, symposia, or meetings attended by any of your officers, physicians, agents, servants, employees or consultants which in any way considered, discussed, reviewed or made recommendations concerning asbestos-related illness, injury or disease; pneumoconiosis; occupational lung disease; dust; industrial hygiene; and/or worker or workplace health or safety.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

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 made to this request on the ground that the terms "meetings," "asbestos related illness," "asbestos related . . . injury," "asbestos related . . . disease," "pneumoconiosis," "occupational disease," "dust," "worker," "work place," "health" and "safety" are undefined or insufficiently defined, 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 object to this request 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. 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 discovery of admissible evidence. Abex further objects to this request on the ground that the information it seeks