

the grounds that such information or materials lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence. Abex objects to this interrogatory on the grounds that the information or materials it purports to seek lack relevance to the issues arising in these cases and are not reasonably calculated to lead to the discovery of admissible evidence.

Abex also objects to this interrogatory to the extent to which it purports to seek information or materials that have been gathered, received, 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 this interrogatory to the extent to which it purports to seek medical records or privileged personnel information, which Abex will not provide absent an appropriate waiver of the applicable privilege.

Subject to and without waiving these objections, and insofar as Abex understands this interrogatory:

SECOND AMENDED ANSWER TO INTERROGATORY NO. 131 (b):

To the best of current and reasonably available information and belief, industrial hygiene surveys were conducted at Abex facilities by Abex's industrial hygienists and their staff, and in at least one instance by an insurance carrier, in conjunction with Abex employees.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 131 (c):

To the best of current and reasonably available information and belief, unknown. Abex has made a reasonable and good faith effort to obtain the requested information, to the extent that