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

Subject to and without waiving these objections, and insofar as Abex understands this interrogatory, see Answer to Interrogatory No. 122