of these boxes of documents, which will be produced to plaintiffs at Abex's facility in Brooklyn, New York, where they are maintained in the ordinary course of business, should plaintiffs decide to inspect them

To the extent that any of the documents that plaintiffs decide to inspect were prepared in anticipation of litigation or for trial or are otherwise covered by the work-product doctrine, or are protected from disclosure by the attorney-client privilege, Abex objects and will not make such documents available to plaintiffs. Abex further objects to this interrogatory to the extent it purports to seek medical records or privileged personnel information. Abex will not provide such information absent an appropriate waiver of the applicable privilege.

Abex has no comprehensive list or log of the documents with respect to which it claims privilege. In the past, when Abex has had cause to review some boxes of documents, it has segregated and/or tagged certain documents with respect to which it claims privilege. The best specificity that Abex can presently provide as to the documents with respect to which it claims privilege is as follows. Documents passing between Abex and/or its predecessors or divisions, on the one hand (collectively "Abex"), and their attorneys, both outside and inhouse counsel, on the other hand, as well as documents prepared at the request of, or for the benefit of such counsel or setting forth mental impressions of the attorneys on matters concerning Abex. These documents, include, but are not limited to, correspondence, memoranda, notes of telephone conversations and other records relating to workers' compensation and personal injury issues, claims and litigation (asbestos and non-asbestos related); environmental issues, claims and litigation; insurance coverage issues, claims and litigation, real estate issues, claims and litigation; real estate and business transactions, labor and employment issues, claims and