

Subject to and without waiving these objections, see objections and response to Request For Production No. 36, above.

REQUEST FOR PRODUCTION NO. 38:

Please produce a true and correct copy of all documents to and/or from Defendant involving any physician, industrial hygienist or public health specialist which in any way relates, refers or pertains to asbestos-related injury, illness or disease, pneumoconiosis, occupational lung disease, dust, industrial hygiene or worker or workplace health or safety.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

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 "asbestos related injury," "asbestos related . . . illness," "asbestos related . . . disease," "pneumoconiosis," "occupational lung disease" "dust," "worker," "work place," "health" and "safety" are undefined, and call for speculation.

Subject to and without waiving these objections, see objections and response to Request For Production No. 36, above.

REQUEST FOR PRODUCTION NO. 39:

Please produce a true and correct copy of all photographs, pictures, prints or any visual depiction at any time generated showing workers or any person or persons installing, applying, removing or in any manner handling or utilizing an asbestos-containing product at any time manufactured, sold or distributed by this Defendant.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

See General Objections. Abex further objects to this request on the grounds that it is overly broad, unduly burdensome, vague, ambiguous and speculative.

Objection is made to this request on the ground that the terms "visual depiction," "applying," "handling," "utilizing" and "distributed" are undefined or insufficiently defined, and call for speculation.