to distinguish among raw asbestos, asbestos contained in building insulation products and/or asbestos-containing automotive and/or railroad friction products, and/or among the different types of asbestos fibers. Because the asbestos fiber contained in Abex's asbestos-containing automotive and/or railroad friction products was chrysotile, the only type of asbestos Abex ever used for product production, which was resin-bonded and encapsulated, proper use of such products did not create or contribute to any adverse health effects.

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.

Asbestos-related worker's compensation claims filed by Abex employees may allegedly arise out of working conditions and involve materials not at all related to those at issue in the present cases. Moreover, a claim may be brought even where the alleged medical condition complained of relates to an employer other than Abex, but the claim is brought against Abex merely because it employed the claimant during the period the alleged condition was diagnosed or because Abex was the claimant's last employer. Furthermore, such claims are governed by standards of proof and theories of liability significantly different from those applicable to plaintiffs' claims in the present action.