

vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent to which it requests information which is not within the personal knowledge, possession or control of Abex, its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of Abex.

Without waiver of these objections, Abex responds that it can provide plaintiff with a reasonable opportunity for inspection and copying of non-privileged documents which may be responsive to this interrogatory and to which objection is not made through Abex counsel at a mutually convenient time and at the Abex document storage facility where they are maintained.

See also Abex's response to Interrogatory No 8, above.

INTERROGATORY NO. 36:

Identify any and all documents, including, but not limited to, written memoranda, specifications, blueprints, formulas, patterns and designs, referring to, relating to or reflecting the design, preparation, application and/or installation of each product listed in response to Interrogatory No. 19.

RESPONSE TO INTERROGATORY NO. 36:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Abex also objects to this interrogatory on the grounds that it seeks or makes inquiry into