Abex objects to this interrogatory on the ground that it is speculative inasmuch as it fails to distinguish among raw asbestos, asbestos contained in building insulation products and/or asbestos-containing automotive friction products, and/or among the different types of asbestos fibers. Because the asbestos fiber contained in Abex's asbestos-containing automotive 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 on the ground that it seeks to impose upon Abex a legal duty or obligation to which it was not subject.

Abex further 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, Gordon S. Siegel, M.D., Chief of the Occupational Medicine Section, Division of Occupational Health, Department of Health, Education and Welfare of the U.S. Public Health Service in Washington, D.C., in 1965, prepared to embark on a 20-year study entitled, "Occupational Health Study of the Asbestos Products Industry in the United States." As part of the study, all employees of Abex who worked or would be hired at the Winchester, Virginia facility were to be surveyed. Information currently available to Abex indicates that this study was terminated by the Government before it was concluded.