

attorney-client privilege, the work product doctrine, the investigative privilege or the party communication privilege.

8. The case captions, docket numbers, jurisdictions, and courts where any legal proceedings, including Worker's Compensation claims, have been filed in which the Defendant or its predecessors, subsidiaries, or affiliated entities have been a party and which concerned injuries arising from asbestos or asbestos-containing products.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8: Abex objects to this request on the grounds that it is burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects on the grounds that it asks for the production of a document which is not currently in existence.

9. Any and all written finding that are now or have ever been in the possession, custody, or subject to the control of the Defendant, which were made by any governmental agency, body, commission, or health organization, including, but not limited to, the United States Public Health Service, OSHA or NIOSH, and which concerned (1) specific hazards associated with the use and handling of asbestos and asbestos products, (2) any restrictions in the use of asbestos and asbestos product, (3) requirements for medical surveillance and examinations of workers, (4) dust monitoring, or (5) necessity of safety equipment.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9: Abex objects to this request to the extent it seeks information concerning the working conditions of Abex employees on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this request on the grounds that it seeks materials protected by the attorney-client privilege and the work product doctrine. To the extent this request seeks materials which are a matter of public record, Abex objects on the grounds