

Abex further objects to this request on the ground that it assumes the truth of matters not established or matters not in evidence.

Abex further objects to this request to the extent to which it purports to seek information that has been gathered, received or prepared in the course of the asbestos litigation, or which is otherwise subject to the attorney-client privilege, 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 request, see objections and response to Interrogatory No. 43.

REQUEST FOR PRODUCTION NO. 19:

Please produce a true and correct copy of all notices received by Defendant prior to 1968 that any person was claiming injury or had sustained an abnormal x-ray reading as a result of using asbestos-containing products mined, manufactured, sold, marketed, installed, or distributed by Defendant (this Request for Production relates to Plaintiffs' Interrogatory No. 48 previously propounded to Defendant).

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

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 "injury," "using," "marketed" and "distributed" are undefined or insufficiently defined, and call for speculation.

Objection is made to this request on the grounds that the term "notices" is argumentative, and calls for a legal opinion or conclusion which Abex is unqualified to render.

Abex further objects to this request on the ground that the term "abnormal" is undefined or insufficiently defined, overly broad, vague, and calls for speculation, which renders this request incomprehensible.