

lacks relevance, and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this request on the ground that the information it seeks otherwise lacks relevance to the issues arising in this case, and is not reasonably calculated to lead to the discovery of admissible evidence.

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. 52.

**REQUEST FOR PRODUCTION NO. 22:**

Please produce a true and correct copy of all reports by experts that Defendant may call upon at the trial of this case (this Request for Production relates to Plaintiffs' Interrogatory No. 53 previously propounded to Defendant).

**RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

See General Objections. Abex further objects to this request on the grounds that it is overly broad and unduly burdensome.

Objection is also made to this request on the ground that it is premature. Discovery and investigation are continuing.

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