INTERROGATORY NO. 2:

Has the person answering these interrogatories made reasonable inquiry of all available sources of information such that plaintiffs may rely upon these answers as the truthful and complete answers made on behalf of defendant? Specifically:

(a) Describe the manner in which the information used to answer these interrogatories was collected, including listing any and all such sources of information relied upon, including identifying any and all records or documents reviewed and identifying persons providing information;

(b) Identify any and all policies, procedures and/or practice involving the retention, collection and/or storage of documents, including effective dates and any and all modifications thereto, which have been in effect since 1940; and,

(c) Identify any and all documents referring to, relating to, and/or reflecting said policies/procedures.

ANSWER: - Answering defendant objects to this interrogatory to the extent that it is overbroad and unduly burdensome. Answering defendant has made reasonable inquiry, including contacting personnel with knowledge of some of the information plaintiff is seeking. Answering defendant does not have a current policy of involving the retention, collection and/or storage of documents.

INTERROGATORY NO. 3:

Describe defendant's corporate/business history, including:

(a) State defendant's full and correct name;

(b) State the form in which defendant presently conducts business (i.e. corporation, partnership, proprietorship, etc.), and any and all other forms in which defendant has conducted business at any time, and the date(s) when business was conducted