

1 4.24 If your answer to the preceding interrogatory is in
2 the affirmative, identify and describe in detail:

3 (a) The manner in which defendant was involved;

4 (b) The person(s) so involved;

5 (c) The time spent in contribution to the creation of
6 the Hart bill.

7 ANSWER: See 4.23 above.

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13 4.25 With respect to liability insurance, identify each
14 and every insurance policy actually, potentially or arguably
15 effective for each year after the founding of defendant.

16 ANSWER: From 1975 through the most recent period relevant to this action,
17 S. K. Wellman's primary insurance coverage was with Fireman's Fund Insurance
18 Company with annual policy limits of \$300,000.00 (1975) and \$500,000.00 (1976
19 forward). Excess coverage has been, at various times, with Fireman's Fund
20 Insurance Company and other carriers.
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