

- (d) State the date or dates upon which said test was conducted;
- (e) Identify any and all documents referring to, relating to or reflecting said test or the results thereof; and
- (f) Identify each and every individual who received a copy of any document referring to, relating to or reflecting the results of said test.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 44:

See Objections and Answer to Interrogatory No. 43, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 45: Did any person, including but not limited to, an officer, agent or employee of Defendant, any predecessor or related company recommend any design changes as a result of any test referenced in your response to the preceding interrogatory?

SECOND AMENDED ANSWER TO INTERROGATORY NO. 45:

See Objections and Answer to Interrogatory No. 43, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 46: If your answer to Interrogatory No. 45 is "Yes," with respect to each such recommended design change:

- (a) State the product or products involved;
- (b) State the test or tests involved;
- (c) State the nature of the change recommended;
- (d) Identify the person(s) making the recommendation;
- (e) State the nature and effective date of any change made; and
- (f) Identify each and every person who participated in the decision to make or not make the recommended design change.