

INTERROGATORY NO. 115:

If your Answer to Interrogatory No. 114 is "yes," identify any and all such documents or conversations described, and with respect to each:

- (a) Identify all persons whose actions were held to constitute a crime or fraud;
- (b) State the current status of the court's determination; and,
- (c) State whether you assert the privilege with respect to disclosing the document or conversation in this case.

ANSWER:

Objection: Defendant objects to this interrogatory on the ground that this Court directed that this interrogatory be redrafted, and it understands that plaintiffs have failed to do so. April 14, 2000 Order, ¶7. Subject to and without waiving objections, *see* Answer to Interrogatory No. 114, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 116: [Withdrawn under April 14, 2000 Order.]

INTERROGATORY NO. 117: [Withdrawn under April 14, 2000 Order.]

INTERROGATORY NO. 118: [Withdrawn under April 14, 2000 Order.]