

L. At the present time, Abex has not conducted discovery or made a review of discovery conducted by other parties. Abex reserves the right to supplement these responses upon completion of this review and of further discovery.

M. Abex does not concede that any of its responses to plaintiff's interrogatories are or will be admissible evidence at a trial of this action, and Abex does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answer at trial.

N. To the extent to which the information contained herein differs in any respect from any prior answer or response to discovery, these answers shall be deemed to update and supersede any prior answers or responses in any and all actions.

RESPONSES

INTERROGATORY NO. 1:

Identify the person answering these interrogatories on behalf of Defendant.

RESPONSE TO INTERROGATORY NO. 1:

See General Objections. Without waiver of these objections, Abex responds that the preparation of these responses required extensive review of documents and consultation with numerous persons over many years. Furthermore, much of the information provided in these responses has been collected over a number of years by many individuals with personal knowledge of the facts, many of whom are retired, are deceased, or are no longer in Abex's employ, or upon a review of records maintained in the regular course of business.

INTERROGATORY NO. 2:

Has the person answering these interrogatories made reasonable inquiry of all available sources of information such that Plaintiff may rely upon these answers as the truthful and complete answers made on behalf of Defendant? List any and all such sources of information relied upon.

RESPONSE TO INTERROGATORY NO. 2:

See General Objections. Without waiver of these objections, see Abex's response to