and potentially misleading that Abex cannot determine the precise nature of the information sought and, therefore, cannot respond without a substantial risk of inaccuracy.

Abex further objects to this interrogatory on the grounds that it is over broad, oppressive, harassing and otherwise unduly burdensome, and calls for speculation to the extent to which it requests information which is not within the personal knowledge, possession or control of Abex, its employees or agents, or which may be ascertained or derived, if at all, only from a page-by-page review of the existing voluminous business records and documents of Abex.

Without waiver of these objections, Abex responds that it can provide plaintiff with a reasonable opportunity for inspection and copying of non-privileged documents which may be responsive to this interrogatory and to which objection is not made through Abex counsel at a mutually convenient time and at the Abex document storage facility where they are maintained.

See also Abex's response to Interrogatory No 8, above.

INTERROGATORY NO 15:

If the answer to any sub-part of Interrogatory No. 14 is "Yes", with respect to each such transaction:

(1) Identify all parties to the transaction;

(2) Identify the subject matter of the transaction;

(3) State the date of the transaction; and,

(4) Identify any and all documents, referring to, relating to or reflecting the transaction.

RESPONSE TO INTERROGATORY NO. 15:

See Abex's response to Interrogatory No. 14, above.

INTERROGATORY NO. 16: