

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

RESPONSES

INTERROGATORY NO. 1:

For each Interrogatory below, please state the name and last known address of each person answering it, including whether he/she is employed by Defendant and if employed by Defendant include job title, length of time employed by Defendant and a year by year list of all other positions, titles, or jobs held when working for Defendant.

RESPONSE TO INTERROGATORY NO. 1:

See General Objections. Abex further objects to this interrogatory to the extent to which it purports to seek information which has been gathered, received or prepared in the course of litigation, or which is otherwise protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege.

Subject to and without waiving these objections, see Verification to follow.

INTERROGATORY NO. 1.1:

Please identify all documents used, related to, or referred to in connection with the preparation of or answers to these Interrogatories and state the number of the Interrogatory and its subpart to each such document.

RESPONSE TO INTERROGATORY NO 1.1:

See General Objections. Abex further objects to this interrogatory on the grounds that it is overly broad and unduly burdensome.

Abex further objects to this interrogatory to the extent to which it purports to seek information which has been gathered, received or prepared in the course of litigation, or which is otherwise protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege.