INTERROGATORY NO. 14:

If the answer to Interrogatory No. 13 is affirmative, please state:

(a) The trade name of each product;

(b) The date each product was altered;

(c) The nature of the alteration;

(d) The reason for the alteration.

RESPONSE:

OBJECTION. Interrogatory No. 14 is objected to on the grounds that it is overly broad, burdensome and requests information which is proprietary in nature. Further, the burden and expense to this defendant to compile the information sought is not outweighed by the questionable evidentiary value of the information sought.

INTERROGATORY NO. 15:

Do any written materials of any kind or character exist relating to the testing of said products?

RESPONSE:

OBJECTION. Interrogatory No. 15 is objected to on the grounds that it is overly broad, burdensome, vexatious, harassing, vague, ambiguous and unintelligible. The burden and expense to this responding defendant to compile the requested information is not outweighed by the questionable evidentiary value of the information sought.

INTERROGATORY NO. 16:

Did defendant make any design changes as a result of the tests referred to in Interrogatory No. 15?

///

LAW OFFICES
INGER & COSTANZO
ESSIONAL CORPORATION
EVENTH FLOOR
VILSHIRE BOULEVARD
GELES, CA 90010-1161
AILING ADDRESS
O. BOX 60858
ERMINAL ANNEX
NGELES, CA 90060
213) 388-9441