REQUEST FOR PRODUCTION NO. 45:

Please produce a true and correct copy of each and every document or other tangible item upon which Defendant will rely for impeachment or rebuttal purposes in the trial of this matter.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

See General Objections. Subject to and without waiving these objections, and insofar as Abex understands this request, see objections and response to Request For Production No. 43, above.

REQUEST FOR PRODUCTION NO. 46:

Please produce a true and correct copy of each and every document, recording or other tangible item that constitutes in whole or in part a statement by Plaintiffs or a statement by any of Plaintiffs' witnesses in this matter.

RESPONSE TO REQUEST NO. 46:

See General Objections. Subject to and without waiving these objections, and insofar as Abex understands this request, see objections and response to Request For Production No. 43, above.

REQUEST FOR PRODUCTION NO. 47:

Please produce a true and correct copy of each and every photograph, videotape recording or other tangible item that is a photographic representation of the Plaintiffs in this matter.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

See General Objections. Subject to and without waiving these objections, and insofar as Abex understands this request, see objections and response to Request For Production No. 43, above.