

PRELIMINARY STATEMENT

1. ~~S. K.~~ Wellman was incorporated in 1971 in the State of Ohio to receive assets purchased from the Wellman Division of Abex Corporation. In responding to these discovery requests, S. K. Wellman is relying solely upon information in its own possession. S. K. Wellman interprets the words "you, your" and words of similar intendment to refer only to S. K. Wellman and, for the sake of convenience and expediting discovery, the Wellman Division of Abex Corporation, to the extent the information is known to personnel of S. K. Wellman. S. K. Wellman undertakes no responsibility to develop information from Abex Corporation, and does not purport to speak for Abex Corporation. To the extent any definition established by plaintiff in the discovery requests is inconsistent with this treatment, S. K. Wellman objects to the definition on the ground that it is overly broad and vague and renders the requests unduly burdensome.

2. S. K. Wellman objects generally to the discovery requests on the ground that they are overly broad in the nature and scope of their inquiry and in the period of time to which the inquiry applies, and are therefore unduly burdensome and oppressive, especially in view of the specific facts now known about this plaintiff's claim. In addition, a portion or all of several of the requests seeks information which is not relevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence.