5.39 Have you conducted or caused to be conducted any surveillance or investigation of any of the facats pertaining to this lawsuit?

ANSWER: S. K. Wellman is investigating facts. S. K. Wellman has not been involved in any surveillance of plaintiff. If the question is asking something other than that, S. K. Wellman will object to it as vague and ambiguous.

5.40 If your answer to the foregoing interrogatory is in the affirmative, state:

(a) Who was investigated or surveilled;

(b) Who conducted such surveillance;

(c) The form of the reporting of such investigation or surveillance;

(d) Identify all tapes, reports, photos, statements, and the like so generated;

(e) Identify the name and address of the custodian of the tapes, reports, photos, statements, etc., referred to in your answer to subpart (d) hereof.

ANSWER: See response to No. 5.39.