

RESPONSE TO MASTER INTERROGATORY 20:

See Preliminary Statement and General Objections.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to, and without waiving objections, this defendant's primary insurance carriers have been Fireman's Fund, and Hartford.

See also General Objection 3(D), supra.