

answers concerning events and records spanning a period of more than four decades. Consequently, the entire set of interrogatories is overly broad, unduly burdensome, oppressive and harassing, and beyond the scope of proper discovery.

Many of these interrogatories call for Abex to characterize the state of knowledge or awareness of a corporation at any given time with regard to a particular fact, event or subject. Abex can only respond to such interrogatories, if at all, by stating on information and belief the degree of knowledge of a particular fact, event or subject as held by a person at a specific time. Such answer, if given, is not intended and should not be deemed to constitute an acknowledgment by Abex that such knowledge is attributable to it.

The failure of plaintiff to limit these interrogatories to information related to Abex's alleged liability in this case renders the interrogatories as a whole, irrelevant to the subject matter of this action individually, and not reasonably calculated to lead to the discovery of admissible evidence. Objection is also made to the extent these interrogatories assume the truth of matters not established, and on the grounds that they seek information which is not relevant to the subject matter of this lawsuit and not reasonably calculated to lead to the discovery of admissible evidence.