

INTERROGATORY NO. 45: Prior to answering these

Interrogatories, have you made due and diligent search of all books, records and papers of the Defendant and due and diligent inquiry of all agents and employees of the Defendant with a view to eliciting all information available in this action? If so, state and identify what records of books and papers were searched and state and identify what agents and employees who were questioned.

ANSWER: Defendant has made a search of reasonably available records and inquired of persons most likely to have the information requested. It would be unduly burdensome to identify each book and paper searched and each employer involved in this process. Without waiving the above objection, the following employees were involved: Dr. F. W. Knoch; C. B. Mallory; T. F. Merkel.

INTERROGATORY NO. 46: Were you named or covered under

any policy of liability insurance which may be construed to provide coverage for any claim stated in the Complaint? If so, as to each policy, state:

- (a) the name of the company;
- (b) the policy number;
- (c) the effective period;
- (d) the maximum liability limits for:
 - (1) injury to any one person;
 - (2) aggregate personal injury limits;