herein.

8. Gleason objects to Plaintiffs' Discovery to the extent that it seeks to require it to provide information other than that which may be obtained through a reasonably diligent search of its records.

9. The responses made herein are made without in any way waiving or intending to waive, but on the contrary intending to reserve and reserving: (1) the right to object on the grounds of competency, privilege, relevancy and materiality, or any other proper ground, to the use of any such information, for any purpose, in whole or in part, in any subsequent step or proceeding in this action or any other action; (2) the right to object on any and all grounds at any time, to any other discovery procedure involving or relating to the subject matter of Plaintiffs' Discovery; and (3) the right to supplement these answers should additional information be discovered.

Each and every objection listed above is incorporated into answering defendant's response to plaintiff's interrogatories. Notwithstanding and without waiving these objections, Gleason hereby responds to Plaintiffs' Discovery as follows:

INTERROGATORIES

INTERROGATORY NO. 1:

Identify the person answering these interrogatories on behalf of Defendant.

ANSWER:

Charles P.Clark, Engineer.

INTERROGATORY NO. 2:

Regarding the Ford Plant in Sterling Heights, Michigan