

NO. CC-00-06741-B

RAYMOND EMERY DAILEY, SR.	§	IN THE COUNTY COURT
and PRISCILLA DAILEY,	§	
Individually and as Next	§	
Friends of RAYMOND EMERY	§	
DAILEY, JR., a Minor	§	
	§	
Plaintiffs,	§	AT LAW #2
	§	
vs.	§	
	§	
GAF CORPORATION (successor to	§	
RUBERROID CORPORATION); et al.	§	
	§	
Defendants.	§	DALLAS COUNTY TEXAS

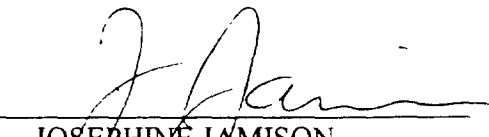
**OBJECTIONS AND RESPONSES TO PLAINTIFF'S REQUESTS FOR PRODUCTION
AND REQUESTS FOR ADMISSION PROPOUNDED TO DEFENDANTS BROWN &
ROOT HOLDINGS, INC., AND BROWN & ROOT, INC.**

TO: Plaintiff, by and through its attorney of record, Ben K. DuBose, Baron & Budd, P.C. 3102
Oak Lawn Ave., Suite 1100, Dallas TX 75219-4281

COMES NOW, Brown & Root, Inc., n/k/a Kellogg Brown & Root, Inc., Defendant in the
above-entitled and numbered cause, and serves these its Objections and Responses to Plaintiff's
Request for Admission, and Requests for Production, pursuant to Rules 194, 196 and 197 of the
Texas Rules of Civil Procedure.

Respectfully submitted,

GODWIN WHITE & GRUBER, P.C.

BY: 
JOSEPHINE JAMISON
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(214) 760-7332 (telecopier)

ATTORNEYS FOR DEFENDANT
BROWN & ROOT, INC.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been served via First Class United States Mail to Plaintiff's counsel, Baron & Budd 3102 Oak Lawn Ave., Suite 1100 Dallas TX 75219-4281 on this the 22 day of April, 2001.


JOSEPHINE JAMISON

PRELIMINARY STATEMENT
APPLICABLE TO ALL REQUESTS FOR ADMISSION
AND REQUESTS FOR PRODUCTION

Subject to the limitations set forth in this Preliminary Statement and Common Objections set forth below, Defendant responds to the Plaintiff's Requests for Admission and Requests for Production. It should be noted that the events at issue in this case are alleged to have occurred many years ago, and continuing investigation, further discovery, independent investigation, legal research, and analysis may supply additional facts and add meaning to known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial changes to, changes in, and variations from the responses set forth herein, which are based on the results of investigation to date. Responses provided previously, and prior to subsequent investigation, should be considered supplemented and/or amended by the responses herein.

It should be further noted that the entity sued is Kellogg Brown & Root, Inc., for alleged acts or omissions of a predecessor entity, Brown & Root, Inc. Responses are provided only as to Brown & Root, Inc., and not as to any other predecessor entity.

The documents identified which Defendant agrees to provide for inspection in response to these specific requests for

productions will be provided for inspection and copying upon reasonable notice at the office of Defendant's counsel.

COMMON OBJECTIONS TO
REQUESTS FOR ADMISSION AND REQUESTS FOR PRODUCTION

Each and every discovery request herein is responded to subject to the common objections set forth below. These objections are set forth here to avoid the duplication and repetition of restating them in each response.

These common objections may be specifically referred to herein for the purposes of clarity. Defendant's failure to specifically incorporate a common objection in a response, however, should not be construed as a waiver of the common objection.

1. Defendant objects to each request for information and documents to the extent it seeks information or documents protected from disclosure by the attorney-client privilege and/or the attorney work product privilege provided for by Tex. R. Civ. P. 192 and Tex. R. Evid. 503.

2. Defendant further objects to each request for information or documents to the extent that it seeks non-relevant information or documents. As used herein, all objections as to relevance shall mean that information or documents requested are irrelevant to the subject matter involved in the pending action

and are not reasonably calculated to lead to the discovery of admissible evidence.

3. Defendant further objects to each request for information or documents to the extent that it seeks information or documents equally accessible to Plaintiff as to Defendant.

4. Defendant further objects to each request for information or documents to the extent it seeks information or documents not in the possession or control of Defendant.

5. Defendant further objects in that the interrogatories require answers in excess of the maximum allowable number of such requests in violation of the rule of limitation of interrogatories. Tex. R. Civ. P. 190.3.

6. Defendant further objects to the use of the term "asbestos products," as well as any variation of this term, on the grounds that its use mischaracterizes the nature and scope of Defendant's business.

7. Defendant further objects to each request for information and documents to the extent it seeks information and documents "in anyway related to," on the grounds that the use of this term renders such request overly broad and vague.

COMMON OBJECTIONS APPLICABLE TO THE "DEFINITIONS" SECTION
IN PLAINTIFF'S REQUESTS FOR ADMISSION AND FIRST REQUEST FOR
PRODUCTION

Defendant objects to the "DEFINITIONS" section in Plaintiff's Requests for Admissions and Request for Production of Documents and each and every "definition" contained in the "DEFINITIONS" section on the grounds that this section and the "definitions" contained therein purport to create and/or impose obligations upon Defendant beyond those contained in the Texas Rules of Civil Procedure. Defendant further objects to the following definitions:

1. Defendant objects to the definitions of "You", "Your company", "Defendant" and "Person(s)", on the grounds that these definitions are vague and ambiguous, overly broad, harassing and burdensome. Defendant further objects to these definitions as calling for discovery from an entity other than the named Defendant in this case. Finally, Defendant objects to these definitions as calling for documents protected from discovery by the attorney-client privilege, attorney work product privilege, and/or joint defense privilege.

2. Defendant objects to the definition of "Document(s)", "written materials" and "Printed matter" as calling for

documents protected by the attorney-client privilege, the attorney work product privilege, the joint defense privilege and also seeks to discover matters exempt from discovery and/or privilege as trade secrets and/or proprietary and/or confidential information. Defendant further objects to the definition of "Document(s)", "written materials" and "Printed matter" as vague, ambiguous, overly broad, unduly burdensome and harassing. Finally, Defendant objects to the definition of "Document(s)", "written materials" and "Printed matter" as calling for documents that are as readily available to Plaintiff as to Defendant.

Subject to the foregoing common objections, Defendant makes and serves these its Objections and Answers to Plaintiff's Requests for Admissions and Requests for Production as follows:

Request for Admission No. 1: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #1 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 1: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 2: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #2 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 2: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 3: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #3 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 3: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 4: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #4 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 4: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 5: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #5 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 5: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 6: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #6 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 6: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response. }

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 7: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #7 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 7: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 8: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #8 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 8: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 9: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #9 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 9: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 10: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #10 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 10: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 11: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #11 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and

information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 11: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 12: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #12 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 12: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 13: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #13 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 13: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 14: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #14 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 14: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 15: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #15 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 15: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 16: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #16 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 16: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 17: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #17 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 17: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 18: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #18 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 18: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 19: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #19 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 19: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 20: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #20 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 20: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 21: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #21 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 21: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 22: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #22 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 22: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 23: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #23 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

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Request for Production No. 23: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 24: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #24 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 24: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 25: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #25 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 25: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 26: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #26 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 26: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 27: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #27 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 27: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 28: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #28 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 28: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 29: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #29 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 29: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 30: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #30 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 30: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 31: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #31 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 31: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 32: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #32 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 32: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 33: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #33 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 33: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 34: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #34 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 34: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 35: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #35 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 35: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 36: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #36 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 36: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 37: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #37 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 37: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 38: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #38 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 38: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 39: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #39 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 39: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that

it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is

overly broad, unduly burdensome and not reasonably

calculated to lead to evidence that will be admissible

at trial in this matter. Defendant further objects to

this request on the grounds that the phrase "all

substantially similar documents" is vague, overbroad

and undefined.

Request for Admission No. 40: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #40 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and

information concerning the origin and identity of the

document to admit or deny whether it is a true and

correct copy of the original, and this request is

deemed denied.

Request for Production No. 40: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 41: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #41 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 41: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 42: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #42 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 42: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 43: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #43 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 43: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 44: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #44 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 44: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that

it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is

overly broad, unduly burdensome and not reasonably

calculated to lead to evidence that will be admissible

at trial in this matter. Defendant further objects to

this request on the grounds that the phrase "all

substantially similar documents" is vague, overbroad

and undefined.

Request for Admission No. 45: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #45 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and

information concerning the origin and identity of the

document to admit or deny whether it is a true and

correct copy of the original, and this request is

deemed denied.

Request for Production No. 45: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 46: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #46 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 46: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 47: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #47 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 47: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 48: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #48 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 48: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 49: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #49 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 49: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 50: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #50 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 50: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 51: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #51 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 51: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 52: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #52 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 52: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 53: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #53 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 53: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 54: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #54 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 54: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 55: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #55 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 55: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 56: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #56 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 56: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 57: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #57 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 57: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to

this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 58: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #58 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 58: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible

at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 59: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #59 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 59: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 60: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #60 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 60: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your

custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 61: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #61 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 61: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 62: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #62 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 62: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 63: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #63 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 63: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 64: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #64 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 64: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 65: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #65 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 65: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 66: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #66 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 66: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 67: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and

incorporated herein by reference) as B&R #67 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 67: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 68: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #68 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 68: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 69: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #69 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and

information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 69: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 70: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #70 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 70: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 71: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #71 is a true and

correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 71: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 72: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #72 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 72: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.
Defendant objects to this request on the grounds that

it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 73: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #73 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 73: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that

it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 74: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #74 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 74: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that

it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 75: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #75 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 75: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 76: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #76 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 76: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 77: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #77 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 77: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 78: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #78 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 78: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 79: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #79 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 79: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 80: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #80 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 80: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 81: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #81 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 81: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 82: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #82 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 82: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your

custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 83: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #83 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 83: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your

custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 84: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #84 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 84: If you denied the preceding

request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 85: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #85 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 85: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 86: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #86 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 86: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 87: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #87 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 87: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 88: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #88 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 88: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 89: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #89 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 89: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 90: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #90 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 90: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 91: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #91 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 91: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 92: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #92 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 92: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 93: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #93 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 93: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 94: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #94 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 94: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 95: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #95 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 95: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 96: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #96 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 96: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 97: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #97 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and

information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 97: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 98: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #98 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 98: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 99: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #99 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 99: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 100: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #100 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 100: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 101: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #101 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and

information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 101: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 102: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #102 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 102: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 103: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #103 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 103: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 104: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #104 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 104: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 105: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #105 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 105: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 106: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #106 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 106: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 107: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #107 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 107: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that

it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is

overly broad, unduly burdensome and not reasonably

calculated to lead to evidence that will be admissible

at trial in this matter. Defendant further objects to

this request on the grounds that the phrase "all

substantially similar documents" is vague, overbroad

and undefined.

Request for Admission No. 108: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #108 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and

information concerning the origin and identity of the

document to admit or deny whether it is a true and

correct copy of the original, and this request is

deemed denied.

Request for Production No. 108: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 109: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #109 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 109: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 110: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #110 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 110: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 111: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #111 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 111: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 112: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #112 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 112: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 113: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #113 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is

deemed denied.

Request for Production No. 113: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 114: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #114 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the

document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 114: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 115: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #115 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 115: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 116: Admit that the document identified

on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #116 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 116: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 117: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #117 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 117: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 118: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #118 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 118: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 119: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #119 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 119: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 120: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #120 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 120: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad

and undefined.

Request for Admission No. 121: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #121 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 121: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to

this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 122: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #122 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 122: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably

calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 123: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #123 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 123: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is

overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 124: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #124 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 124: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 125: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #125 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 125: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 126: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #126 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 126: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 127: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #127 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 127: If you denied the preceding

request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 128: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #128 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 128: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 129: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #129 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 129: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 130: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #130 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 130: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 131: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #131 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is

deemed denied.

Request for Production No. 131: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 132: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #132 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and

correct copy of the original, and this request is deemed denied.

Request for Production No. 132: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 133: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #133 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and

information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 133: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 134: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #134 is a true and

correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 134: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 135: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #135 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 135: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 136: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #136 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 136: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 137: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #137 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 137: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad

and undefined.

Request for Admission No. 138: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #138 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 138: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to

this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 139: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #139 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 139: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably

calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 140: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #140 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 140: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is

overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 141: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #141 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 141: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 142: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #142 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 142: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 143: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #143 is a true and correct copy of the original. See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 143: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your

custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 144: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #144 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 144: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 145: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #145 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 145: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 146: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #146 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 146: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 147: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #147 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is

deemed denied.

Request for Production No. 147: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 148: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #148 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the

document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 148: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 149: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #149 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 149: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 150: Admit that the document identified

on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #150 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 150: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 151: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #151 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 151: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 152: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #152 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 152: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 153: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #153 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 153: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 154: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #154 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 154: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 155: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #155 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 155: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad

and undefined.

Request for Admission No. 156: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #156 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 156: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to

this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 157: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #157 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 157: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably

calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 158: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #158 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 158: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is

overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 159: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #159 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 159: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is

overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 160: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #160 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 160: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 161: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #161 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 161: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 162: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #162 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 162: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 163: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #163 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 163: If you denied the preceding

request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 164: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #164 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 164: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 165: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #165 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 165: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 166: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #166 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is

deemed denied.

Request for Production No. 166: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 167: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #167 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the

document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 167: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 168: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #168 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 168: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 169: Admit that the document identified

on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #169 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 169: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 170: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #170 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 170: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 171: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #171 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 171: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 172: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #172 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 172: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad

and undefined.

Request for Admission No. 173: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #173 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 173: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to

this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 174: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #174 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 174: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably

calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 175: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #175 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 175: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably

calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 176: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #176 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 176: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is

overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 177: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #177 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 177: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 178: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #178 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 178: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 179: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #179 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 179: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 180: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #180 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 180: If you denied the preceding

request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 181: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #181 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 181: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 182: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #182 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 182: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 183: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #183 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is

deemed denied.

Request for Production No. 183: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 184: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #184 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the

document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 184: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 185: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #185 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 185: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 186: Admit that the document identified

on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #186 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 186: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 187: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #187 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 187: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 188: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #188 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 188: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 189: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #189 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 189: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad

and undefined.

Request for Admission No. 190: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #190 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 190: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to

this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 191: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #191 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 191: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably

calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 192: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #192 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 192: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 193: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #193 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 193: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 194: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #194 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 194: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 195: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #195 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 195: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 196: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #196 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 196: If you denied the preceding

request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 197: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #197 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 197: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 198: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #198 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 198: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 199: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #199 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is

deemed denied.

Request for Production No. 199: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 200: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #200 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and

information concerning the origin and identity of the

document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 200: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 201: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #201 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 201: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 202: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #202 is a true and

correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 202: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 203: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #203 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 203: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 204: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #204 is a true and correct copy of the original.

RESPONSE: Admitted.

Request for Production No. 204: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: Not applicable.

Request for Admission No. 205: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #205 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 205: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents

to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 206: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #206 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 206: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 207: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #207 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 207: If you denied the preceding request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for Admission, which is incorporated herein in response. Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 208: Admit that the document identified on Plaintiffs' Exhibit List (attached hereto as Exhibit "A" and incorporated herein by reference) as B&R #208 is a true and correct copy of the original.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the document to admit or deny whether it is a true and correct copy of the original, and this request is deemed denied.

Request for Production No. 208: If you denied the preceding

request for Admission, either in whole or in part, then produce any and all substantially similar documents which are in your custody, possession or control.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that it fails to identify with particularity the documents to be produced, as well as on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to evidence that will be admissible at trial in this matter. Defendant further objects to this request on the grounds that the phrase "all substantially similar documents" is vague, overbroad and undefined.

Request for Admission No. 209: Admit that each and every document listed on the attached Exhibit "A" satisfies the authenticity requirements of TEX.R.CIV.EVID. 901.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the documents to admit or deny whether they satisfy the authenticity requirements of TEX.R.CIV.EVID. 901, and this request is deemed denied.

Request for Production No. 209: As to any documents listed on the attached Exhibit "A", the authenticity of which you are denying in response to the foregoing Request, produce all documents which support your denial, in whole or in part.

RESPONSE: See Defendant's response to Request for Admission No.

209, which is incorporated herein in response.

Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of evidence admissible at trial in this matter. Defendant further objects that this Request fails to identify with particularity the documents to be produced.

Request for Production No. 210: As to any documents listed on the attached Exhibit "A", the authenticity of which you are denying in response to the foregoing Request, produce any and all versions of such document, the authenticity of which you are willing to admit.

RESPONSE: See Defendant's response to Request for Admission No.

209, which is incorporated herein in response.

Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of evidence admissible at trial in this matter. Defendant further objects to this request on the grounds that it fails to identify with particularity the documents to be produced. Defendant further objects to this request on the grounds that the phrase "any and all versions of

such documents" is overbroad, vague and undefined.

Request for Admission No. 210: Admit that each and every document listed on the attached Exhibit "A" satisfies at least one of the categories of authenticity provided for in TEX.R.CIV.EVID. 902.

RESPONSE: Denied. Defendant lacks sufficient knowledge and information concerning the origin and identity of the documents to admit or deny whether they satisfy the authenticity requirements of TEX.R.CIV.EVID. 901, and this request is deemed denied.

Request for Production No. 211: As to any documents listed on the attached Exhibit "A", the self-authenticating nature of which you are denying in response to the foregoing Request, produce all documents which support your denial, in whole or in part.

RESPONSE: See Defendant's response to Request for Admission No. 210, which is incorporated herein in response. Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of evidence admissible at trial in this matter. Defendant further objects to this request on the grounds that it fails to identify with particularity the documents to be produced.

Request for Production No. 212: As to any documents listed on the attached Exhibit "A", the self-authenticating nature of which you are denying in response to the foregoing Request, produce any and all versions of such document, the authenticity of which you are willing to admit.

RESPONSE: See Defendant's response to Request for Admission No.

210, which is incorporated herein in response.

Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of evidence admissible at trial in this matter. Defendant further objects to this request on the grounds that it fails to identify with particularity the documents to be produced. Defendant further objects to this request on the grounds that the phrase "any and all versions of such documents" is overbroad, vague and undefined.

Request for Admission No. 211: Admit that each and every document listed on the attached Exhibit "A" is a true and correct copy of a document that was made at or near the time by or from information transmitted by a person with knowledge and kept in the regularly conducted business activity of the defendant and that it was the regular practice of the defendant to make such document.

RESPONSE: Defendant objects to the compound nature of this

Request. By way of further response: Denied.

Defendant lacks sufficient knowledge and information

concerning the origin and identity of the documents to admit or deny whether they are a true and correct copy of the originals, and this request is deemed denied.

Request for Production No. 213: As to any documents listed on the attached Exhibit "A", which you claim is not a true and correct copy of a document that was made at or near the time by or from information transmitted by a person with knowledge and kept in the regularly conducted business activity of the defendant and that it was the regular practice of the defendant to make such document, in response to the foregoing Request, produce all documents which support your denial, in whole or in part.

RESPONSE: Defendant objects to the compound and confusing nature of this Request. By way of further response, See Defendant's response to Request for Admission No. 211, which is incorporated herein in response. Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of evidence admissible at trial in this matter. Defendant further objects to this request on the grounds that it fails to identify with particularity the documents to be produced.

Request for Production No. 214: As to any documents listed on the attached Exhibit "A", which you claim is not a true and correct copy of a document that was made at or near the time by or from information transmitted by a person with knowledge and

kept in the regularly conducted business activity of the defendant and that it was the regular practice of the defendant to make such document, in response to the foregoing Request, produce any and all versions of such document, which you are willing to admit is a true and correct copy of a document that was made at or near the time by or from information transmitted by a person with knowledge and kept in the regularly conducted business activity of the defendant and that it was the regular practice of the defendant to make such document.

RESPONSE: Defendant objects to the compound and confusing nature of this Request. By way of further response, See Defendant's response to Request for Admission No. 211, which is incorporated herein in response. Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of evidence admissible at trial in this matter. Defendant further objects to this request on the grounds that it fails to identify with particularity the documents to be produced. Defendant further objects to this request on the grounds that the phrase "any and all versions of such documents" is overbroad, vague and undefined.

Request for Admission No. 212: Admit that each and every document listed on the attached Exhibit "A" is a true and correct copy of a document found among the business records of the Defendant.

RESPONSE: Denied.

Request for Production No. 215: As to any documents listed on the attached Exhibit "A", which you claim is not a true and correct copy in response to the foregoing Request, produce all documents which support your denial, in whole or in part.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that

it is overly broad, unduly burdensome and not

reasonably calculated to lead to the discovery of

evidence admissible at trial in this matter. Defendant

further objects to this request on the grounds that it

fails to identify with particularity the documents to

be produced.

Request for Production No. 216: As to any documents listed on the attached Exhibit "A", which you claim is not a true and correct copy in response to the foregoing Request, produce any and all versions of such document which you admit is a true and correct copy.

RESPONSE: See Defendant's response to the cited Request for

Admission, which is incorporated herein in response.

Defendant objects to this request on the grounds that

it is overly broad, unduly burdensome and not

reasonably calculated to lead to the discovery of

evidence admissible at trial in this matter. Defendant

further objects to this request on the grounds that it

fails to identify with particularity the documents to

be produced. Defendant further objects to this request on the grounds that the phrase "any and all versions of such documents" is overbroad, vague and undefined.

Request for Production No. 217: If you contend that any of the documents described on the attached Exhibit "A" have in any manner been edited, purged, culled, changed, altered or in any other manner and/or made different from the way such records existed when created, produce all documents supporting your contention.

RESPONSE: Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of evidence admissible at trial in this matter. Defendant further objects to this request on the grounds that it fails to identify with particularity the documents to be produced. Defendant further objects to this request on the grounds that the phrase "all documents" is both overbroad and undefined. By way of further response, See the deficiencies and additions apparent on the face of the document.

Request for Production No. 218: As to any documents listed on the attached Exhibit "A", as to which you contend have in any manner been edited, purged, culled, changed, altered or in any other manner and/or made different from the way such records existed when created, produce any and all versions of such

document that you contend has not been in any manner edited, purged, culled, changed, altered or in any other manner and/or made different from the way such record existed when created.

RESPONSE: Defendant objects to this request on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of evidence admissible at trial in this matter. Defendant further objects to this request on the grounds that it fails to identify with particularity the documents to be produced. Defendant further objects to this request on the grounds that the phrase "any and all versions of such documents" is overbroad, vague and undefined.

Request for Production No. 219: Produce all documents listed on the attached Exhibit "A" which are in your custody, possession or control.

RESPONSE: Defendant objects to this request on the grounds that it is overly broad and unduly burdensome in that plaintiff's counsel is demanding copies of more than 200 documents that plaintiff already has in its possession, and most, if not all, of the documents have nothing to do with the issues in this case.