the amount of each dividend declared and/or paid.

ANSWER:

Marathon objects on the basis that the information requested is immaterial, irrelevant, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection and without waiving this objection--no. Marathon is not a publicly traded stock.

INTERROGATORY NO. 128: Does the Defendant owe to any person any cumulative dividends that have not been declared and paid? If so, please provide detailed information concerning same.

ANSWER:

Marathon objects on the basis that the information requested is immaterial, irrelevant, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection and without waiving this objection--no.

INTERROGATORY NO. 129: Has the Defendant determined its net worth, value, or fair market value? If so:

(a) How do you define the net worth of the Defendant?

(b) How do you define the value of the Defendant if different than the net worth and value of the Defendant?

(c) How do you define the fair market value of the Defendant if different than the net worth and value of the Defendant?

ANSWER:

Marathon objects on the basis that the information requested is immaterial, irrelevant, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection and without waiving this objection, please see documents produced in response to Request for Production No. 3.

INTERROGATORY NO. 130: If you have ever determined the net worth, value or fair market value of the Defendant, please state:

(a) What did the Defendant determine to be the net worth, value or fair market value of the Defendant?

(b) What factors and evidence did you consider in making your determination?

(c) How were said factors and evidence evaluated in making your determination?

(d) What calculations did you perform in making your determination?

(e) Has the valuation of any asset, or group of assets, been discounted? If so, what was the reason for the discount and the method used to determine the discount?

(f) How were the intangible assets of the Defendant valued?

ANSWER:

Marathon objects on the basis that the information requested is immaterial, irrelevant, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection and without waiving this objection, please see documents produced in response to Request for Production No. 3.

INTERROGATORY NO. 131: Has the Defendant made any representation or statement of the value or net worth of the Defendant or any group of its assets to any outside entity or party? If so, please state:

(a) To whom such representation was made?

(b) The purpose of making such representations.

(c) If the statement or representation was different than one of the values solicited in Interrogatory No. 130, please provide all information requests in Interrogatory No. 130 with regard to this representation or statement.

ANSWER:

Marathon objects on the basis that the information requested is immaterial, irrelevant, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection and without waiving this objection, please see documents produced in response to Request for Production No. 3.