this and any other jurisdiction. Defendant does not purport to have adopted or applied any definitions set forth at the outset of or at other places in plaintiffs' discovery nor has it assumed the improper, unproved and hypothetical facts or accepted the terminology or substance of plaintiffs' claims incorporated in, implied or alluded to within this discovery.

Due to the broad and diverse nature of Gleason's operations and business, these answers are limited to Gleason's operations involving the manufacture and sale of Gleason machinery which operations appear to be the basis of the claims asserted.

General Objections

1. Gleason objects to Plaintiffs' Discovery on the grounds that it is overly broad, unduly burdensome, seeks information which is not relevant to Plaintiffs' cause of action, and seeks information which is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, and subject to any additional objections herein, Gleason provides its Answers herein.

2. Gleason objects to Plaintiffs' Discovery to the extent that said Discovery seeks information protected by either the attorney-client privilege or the work-product doctrine. Without waiving these objections, and subject to any additional objections herein, Gleason provides its Answers herein.

3. Gleason objects to Plaintiffs' Discovery to the extent that it seeks information that is not within the custody or control of Gleason, is otherwise within the public domain, or is otherwise equally or more available to Plaintiffs than to Gleason. Without waiving this objection,