

subject matter of this lawsuit or which may lead to the discovery of information material to the subject matter of this lawsuit.

ANSWER to Q118.

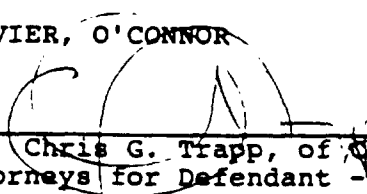
Defendant objects to this interrogatory because it is over broad and unduly burdensome. Without prejudice to or waiver of this objection, see answers to Interrogatories Nos. 1-117, above. Furthermore, defendant states that discovery in this matter is ongoing therefore defendant reserves the right to supplement its answer and will timely identify any witnesses to plaintiff prior to trial and pursuant to any discovery schedule ordered by this Court.

Dated:

Buffalo, New York

Yours, etc.,

BOUVIER, O'CONNOR

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