SECOND AMENDED ANSWER TO INTERROGATORY NO. 112:

Abex objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague and ambiguous and calls for speculation.

Abex also objects to this interrogatory to the extent to which it purports to seek information or materials that have been gathered, received, or prepared in the course of litigation, or which are otherwise subject to the attorney-client privilege, protected by the attorney work-product doctrine, the rule protecting materials prepared in anticipation of and/or in connection with litigation, or any other applicable privilege.

Abex further objects to this interrogatory to the extent it purports to seek information that is a matter of public record, and thus, equally available to plaintiffs as Abex.

Subject to and without waiving these objections, since this interrogatory refers to Interrogatory No. 111, this interrogatory cannot be answered unless and until Interrogatory No. 111 has been redrafted and resubmitted to defendants.

INTERROGATORY NO. 113: If your answer to Interrogatory No. 112 is "Yes," with respect to each such occasion described:

(a) Identify the lawsuit involved, the court which imposed the sanctions or issued the contempt citation, and any other court which reviewed the same;

(b) Describe the violation for which sanctions or contempt was imposed;

(c) If the violation involved the failure or refusal to produce any document(s), identify any and all such documents;

(d) If the violation involved any failure to truthfully answer or to respond to Interrogatories, identify any and all such Interrogatories and your response thereto, including the person answering on your behalf;

(e) State the present status or final disposition of the matter, whichever is applicable; and;