

3. Without waiving any of these objections, S. K. Wellman provides the following responses. If, and to the extent, plaintiff deems that the scope, interpretations or conditions of S. K. Wellman's responses are not fully responsive to any portion or portions of the discovery requests, S. K. Wellman objects to those portions on the ground that they are so vague and unprecise as to be unintelligible, that they seek information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and that they are unduly broad, burdensome and oppressive.

4. The following answers and objections are based upon information in the possession of the responding party at the time of the preparation of the answers. Discovery will continue as long as permitted by statute or stipulation of the parties and the investigation of S. K. Wellman's attorneys and agents will continue to and throughout the trial of this action. S. K. Wellman specifically reserves the right at the time of trial to introduce any evidence from any source which may hereafter be discovered and testimony from any witnesses whose identities may hereafter be discovered.

5. If any information has unintentionally been omitted from these responses, S. K. Wellman reserves the right to apply for relief so as to permit the insertion of the omitted data from these responses.

6. The above preliminary statements shall apply to each and every response given herein, and shall be incorporated by reference as though fully set forth in each and all of the responses appearing in the following pages.