

refusing to comply with, any court order, for discovery fraud, or for the failure to provide complete, accurate and truthful responses to discovery?

ANSWER TO INTERROGATORY 112.

Not to this defendant's knowledge.

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, which ever is applicable; and,
- (f) Identify any and all documents referring to, relating to or reflecting said matter, including, but not limited to, pleadings, exhibits and court orders.

ANSWER TO INTERROGATORY 113.

Not applicable.

INTERROGATORY NO. 114: In any lawsuit as described in Interrogatory No.111, has any document or conversation as to which you asserted the attorney-client privilege been held by any court to be not privileged on the basis of the crime-fraud exception?

ANSWER TO INTERROGATORY 114.

Not to this defendant's knowledge.

INTERROGATORY NO. 115: If your answer to Interrogatory No. 114 is "Yes," identify any and all such documents or conversations described, and with respect to each:

- (a) Identify all persons whose actions were held to constitute a crime or fraud;
- (b) State the current status of the court's determination; and,