further objects to any demand for information that would require Eaton to conduct investigations of divisions, business operations or product lines different from and unrelated to the Eaton business operation that was involved with the products specifically identified in Plaintiffs' complaint. Such information is neither admissible nor in any way calculated to lead to the discovery of admissible evidence. In responding to these discovery requests, the term AEaton@ and all information provided by Eaton is limited to Eaton manufactured brake assemblies.

8. Vague Overly Broad and Ambiguous. Eaton objects to plaintiffs' definitions as vague, overly broad and ambiguous.

9. Confidential or Privileged Information. Eaton objects to plaintiffs' Requests to the extent that they seek confidential or proprietary information or information protected by the attorney-client privilege or work-product doctrine and the responses do not provide such information to the extent requested. With regard to confidential, trade secret or other proprietary information, Eaton reserves the right to seek an appropriate protective order for any information or documents provided in response to plaintiffs' discovery demands.

10. Voluminous. Eaton objects that the Requests are voluminous contain inordinate parts and subparts and greatly exceed the number of discovery requests permitted by law or which are reasonable and appropriate under the circumstances of this case.

11. Right to Supplement. Eaton states that its investigation into the facts and circumstances surrounding the allegations made by the Plaintiff is continuing. The information provided in these Responses is derived from the results of Eaton's investigation to date. Should additional information come to light, Eaton reserves the right to supplement these Responses as appropriate.

12. No Admission. Except for facts specifically admitted herein, no admission of any nature whatsoever is to be implied or inferred. The fact that any discovery request has been answered should not be taken as an admission or concession of the existence of any facts set forth or assumed by any discovery request, that such answer constitutes evidence of any fact set forth or assumed in the discovery request, or that the discovery request or Eaton's response thereto is admissible at trial. Any and all objections, whether or not stated herein, are reserved and may be interposed at the time of trial.

13. Impermissible Modification. Eaton objects to the definitions and instructions as impermissible modifications of controlling law.

14. Incorporation by Reference. These general objections are incorporated by reference into each Response to each Request set forth below.

RESPONSES TO SPECIFIC INTERROGATORIES