

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

SECOND AMENDED ANSWER TO INTERROGATORY NO. 113:

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 on the grounds that the information or materials it purports to seek lack relevance to the issues arising in these cases and are not calculated to lead to the discovery of admissible evidence.

Abex further 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 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, see Answer to Interrogatory No. 112.

INTERROGATORY NO. 114: To be redrafted and resubmitted to defendants pursuant to order of the Court.

INTERROGATORY NO. 115: To be redrafted and resubmitted to defendants pursuant to order of the Court.

INTERROGATORY NO. 116: Withdrawn by plaintiff or stricken by the Court.

INTERROGATORY NO. 117: Withdrawn by plaintiff or stricken by the Court.

INTERROGATORY NO. 118: Withdrawn by plaintiff or stricken by the Court.

INTERROGATORY NO. 119: Withdrawn by plaintiff or stricken by the Court.