Where used with respect to a person, "identify" means to give the person's name, employer, title or position with that employer, and business address and last known home address if the person is no longer so employed. If the person identified is, or has been, an employee, officer, director or agent of defendant, also state: the period of time during which he/she has been employed by defendant; all positions, titles or jobs that person has held with the defendant and the years each position was held; and, whether or not plaintiffs should contact said person directly or only through defense counsel.

G. Where appropriate, the singular includes the pleural and vice-versa.

ANSWERS

Gleason Corporation (hereinafter referred to as "Gleason") has made a good faith effort to responsively address plaintiffs' discovery to which objections have not otherwise been filed. For this reason, Gleason is relying upon information collected from various sources, including information recently identified. Defendant's exploration of its prior operations is continuing and these responses amend and supersede any previously filed responses to discovery in this and any other jurisdiction. Defendant does not purport to have adopted or applied any definitions set forth at the outset of or at other places in plaintiffs' discovery nor has it assumed the improper, unproved and hypothetical facts or accepted the terminology or substance of plaintiffs' claims incorporated in, implied or alluded to within this discovery.

Due to the broad and diverse nature of Gleason's