

management; as well as other legal issues, transactions and claims.

When a plaintiff avails himself or herself of the offer to inspect the documents, Abex will remove any documents with respect to which it claims privilege, on a box-by-box basis, and will prepare and serve a privilege log on plaintiff within sixty (60) days after the last date upon which the documents were inspected. Any dispute as to the propriety of any objection can thereafter be resolved by the Court.

INTERROGATORY NO. 123: If your answer to Interrogatory No. 122 is "Yes," then with respect to each such inspection, test or survey:

- (a) Identify the governmental entity conducting the same;
- (b) State the dates(s) on which the same was conducted;
- (c) Describe the nature of the inspection, test or survey including, but not limited to, the results or conclusions thereof; and
- (d) Identify any and all documents referring to, relating to or reflecting the same.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 123:

See Objections and Answer to Interrogatory No. 122, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 124: Identify:

- (a) Any expert whom you intend to call as a witness;
- (b) The subject matter on which the expert is expected to testify;
- (c) The substance of the facts and opinions to which the expert is expected to testify;
- (d) A summary of the grounds for each opinion;
- (e) The address of such person and field of expertise;
- (f) Identify and produce each treatise, article or text upon which the expert will rely in testifying.