

INTERROGATORY NO. 112:

In any lawsuit, as described in Interrogatory No. 111, has Defendant been subject to sanctions, a contempt citation or similar action for failing, or refusing to comply with, any court order, for discovery fraud, or for the failure to provide complete, accurate and truthful responses to discovery?

RESPONSE TO INTERROGATORY NO. 112:

Since this interrogatory refers to Interrogatory No. 111, this interrogatory cannot be answered unless and until Interrogatory No. 111 has been redrafted and resubmitted to defendants.

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, whichever 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.

RESPONSE TO INTERROGATORY NO. 113:

Since this interrogatory refers to Interrogatory No. 112, this interrogatory cannot be answered unless and until Interrogatory No. 111 has been redrafted and resubmitted to