2. Defendant objects to each interrogatory and part thereof to the extent it calls for answers disclosing information protected by (a) the attorney-client privilege, (b) attorney-work product doctrine, (c) any applicable privilege relating to communications between counsel for defendant and counsel for other defendants in this or other cases regarding defense of the case, (d) any applicable privilege relating to communications between defendant's employees or counsel and defendant's insurers regarding the defense of this claim or claims of this type, (e) any privilege relating to confidential trade secrets, proprietary information or confidential communications with any government agency, (e) the right of privacy or (f) any other privilege.

3. Defendant objects to each interrogatory and part thereof to the extent that information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to defendant.

4. Defendant objects to each interrogatory and part thereof to the extent that it seeks information not within the custody and control of defendant.

5. Defendant objects to each interrogatory and part thereof to the extent that it seeks to require answers or information, or require identification of documents, or impose obligations, beyond those permitted by the applicable Rules of Civil Procedure and local rules of Court.

6. Defendant objects to each interrogatory and part thereof to the extent that it seeks information in a form different from