

thereof in any subsequent proceeding or trial in this or any other action or for any other purpose;

- b. The right to object to other discovery proceedings involving or related to the subject matter of the request to which these responses are directed;
- c. The right at any time to revise, correct, add to, or clarify any or all of the responses, all of which are given subject to correction of any such omissions or errors; and
- d. The objections set forth above and/or in response to any specific request for production.

13. Defendant objects as unduly burdensome and oppressive to producing multiple copies of the same document if a document relates to more than one request.

14. Defendant objects as unduly burdensome and oppressive requests relating to all of Warner Electric Brake & Clutch's products. Without Plaintiffs' specific product identification such requests are overly broad and unduly burdensome. Warner Electric Brake & Clutch made many different clutches and brakes for industrial and other applications that varied in many ways, such as: size, shape, and physical characteristics.

15. Defendant objects to producing any documents, including engineering documents and employee personnel and medical records, which the Buyer considers to be proprietary or confidential.