

GENERAL OBJECTIONS

The following objections are incorporated by reference into the responses:

1. Defendant objects to each request for production and part thereof to the extent that Plaintiff may assert that Plaintiff's definitions bind Defendant.
2. Defendant objects to each request for production and part thereof to the extent they call for 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 regarding this or similar litigation, (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 or confidential communications, (f) the right of privacy, or (g) any other privilege.
3. Defendant objects to each request for production and part thereof to the extent that information sought is not 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 request for production and part thereof to the extent that they seek information already possessed by Plaintiffs, information generally obtainable from the public domain, and/or which is more readily obtainable from a third party in a manner that is less burdensome and/or more convenient than that which plaintiffs seek to impose on defendant.
5. Defendant objects to each request for production and part thereof to the extent they seek information or documents not within the custody and control of Defendant.