

GENERAL OBJECTIONS

1. Plaintiffs' general objections, as set forth herein, are to be considered continuing objections and responses to the specific Interrogatories that follow, even if not referred to in the objection and response to a specific Interrogatory. Plaintiffs' objections and responses given herein shall not be construed to waive or preclude any objections it may later assert.

2. Plaintiffs object to each Definition and Instruction and each Document Request to the extent that they are vague, ambiguous, overly broad, unduly burdensome, or seek irrelevant information.

3. Plaintiffs object to each Definition and Instruction and each Document Request to the extent that it seeks to impose obligations on plaintiffs beyond the requirements of the Federal Rules of Civil Procedure and any applicable local rules.

4. Plaintiffs object to each Definition and Instruction and each Document Request to the extent that it seeks information protected against disclosure by the attorney-client privilege, the work-product doctrine, or any other privilege, immunity, doctrine, or rule of confidentiality. Plaintiffs further object to each Definition and Instruction, and each Document Request, to the extent it seeks disclosure of information that would violate any of the privacy or other rights of individuals.

5. In responding to these Document Requests, plaintiffs do not waive the foregoing objections or the specific objections that are set forth in the responses to particular requests. In addition, plaintiffs do not concede by responding that the information sought or produced is relevant to the subject matter of this action or is calculated to lead to the discovery of admissible evidence. Plaintiffs expressly reserve the right to object to further discovery into the subject

matter of these Document Requests and the right to object to the introduction into evidence of any of the information provided in response to the Document Requests.

6. Although plaintiffs have exercised due diligence in responding to the Document Requests, plaintiffs reserve the right to amend or supplement their responses and objections to the Document Requests if additional responsive documents are discovered or located hereafter.

SPECIFIC OBJECTIONS TO INSTRUCTIONS

1. Plaintiffs object to Instruction No. 10 to the extent it requires plaintiffs to indicate a partial withholding on the partially withheld document itself. Instead, plaintiffs are providing the Bates numbers of partially redacted documents in a Privilege Log, so that defendants can readily identify the documents.

RESPONSES AND SPECIFIC OBJECTIONS

Plaintiffs incorporate herein by reference their Definitions and General Objections with respect to each Document Request to which those objections apply, as though fully set forth therein, and no specific objection or response is intended or shall be construed to waive any of those objections. Subject to and without waiving those objections, plaintiffs respond to defendants' Document Requests as set forth below. A specific list of documents (identified by their Bates label or label ranges), and the specific Document Requests to which they respond, is set forth in the attached Addendum.

Request No. 1:

Documents sufficient to show your organizational or corporate structure, including but not limited to all departments, divisions, committees, boards, subsidiaries, affiliates, or other sub-units.