

letters, diaries, calendars, desk pads, computer back-up files, their author(s) and creation dates.

RESPONSE: Objection. Defendant objects to this Request, as it seeks attorney-client protected communication and attorney work-product and otherwise seeks information that is irrelevant and will not lead to the discovery of relevant and admissible evidence.

28. Produce all documents or case logs, which show name(s) of defendant's counsel who attended each of all hearings in the Court, including but not limited to the specific hearing dates, counsel's name(s) and their certificate(s).

RESPONSE: Objection. Defendant objects to this Request, as it seeks attorney-client protected communication and attorney work-product and otherwise seeks information that is irrelevant and will not lead to the discovery of relevant and admissible evidence.

29. Produce all documents produced by defendant in any other litigation, where defendant's business practice and credibility are or were at issue.

RESPONSE: Objection. Defendant objects to this Request as it requires information in violation of the attorney work-product and attorney-client communication privileges. Moreover, this Request is overbroad, vague, unduly burdensome and requests information that is irrelevant in determining any issues in this case, including whether the defendant is liable to the plaintiff on any of the claims at issue. Further, this Request is improper because it is unlikely to lead to the discovery of relevant and admissible information.

30. Produce all pleadings, motions, filings, judgments, awards and court orders in any other litigation, where defendant's business practice and credibility are or were at issue.