

the reports may need to be modified and/or supplemented because discovery is ongoing, several third parties have yet to respond fully, or at all, to outstanding subpoenas and witnesses with potentially pertinent testimony to the Requests have yet to be deposed.

2. Respondents object to the Requests to the extent that they

greater than, beyond the requirements of, and/or at variance to the Rules. In particular, Complaint Counsel already has exceeded its limit of 50 requests for admissions. Although there

Complaint Counsel's limit on the number of requests for admissions is 50.

6. Respondents object to the Requests to the extent that they seek legal conclusions. For example, Respondents object to the Requests to the extent that they seek admissions that

particular documents actually are admissible into evidence because such determinations must be

made by the Court, not the parties. Complaint Counsel is really asking Respondents to admit that they will not object to the admissibility of particular documents. Such a request is not authorized under Rule 3.32 and, in any event, is premature given that the parties are in the midst of discovery and pertinent documents have not yet been produced by third parties. Accordingly, all Requests should be deemed denied to the extent that they seek an admission that a particular document is admissible into evidence. Notwithstanding this general objection and denial, Respondents ultimately may agree before trial not to object to the admissibility of certain

Notwithstanding this general objection, Respondents ultimately measure to the satisfaction of

some or all of the referenced documents as part of the proposed stipulations required under the Scheduling Order entered in this litigation.

8. Respondents state that the documents referenced in each Request are subject to the Protective Order entered in this litigation.

1568. Exhibits CX-05092 through CX-05093 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a transmission verification report) between [REDACTED] and Highland Park from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

~~ANSWER: — Subject to and notwithstanding the general objections, Defendant's refer~~

~~Complaint Counsel to the contract index attached hereto as Exhibit A~~

letter and a transmission verification report) between [REDACTED] and Highland Park from

[REDACTED] This set of exhibits is admissible into evidence in this matter.

[REDACTED]. The contract is a business record of one or both contracting parties. The contract

ANSWER: Subject to and notwithstanding the general objections, Respondent's refer
Complaint Counsel to the contract index attached hereto as Exhibit A.

1575 Exhibit CY 05006 constitutes an authentic copy of contract between S41

complete set of the [REDACTED] contracts and amendments between [REDACTED] and

05096. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

ANSWER: Subject to and notwithstanding the general objections, Defendant's con-

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

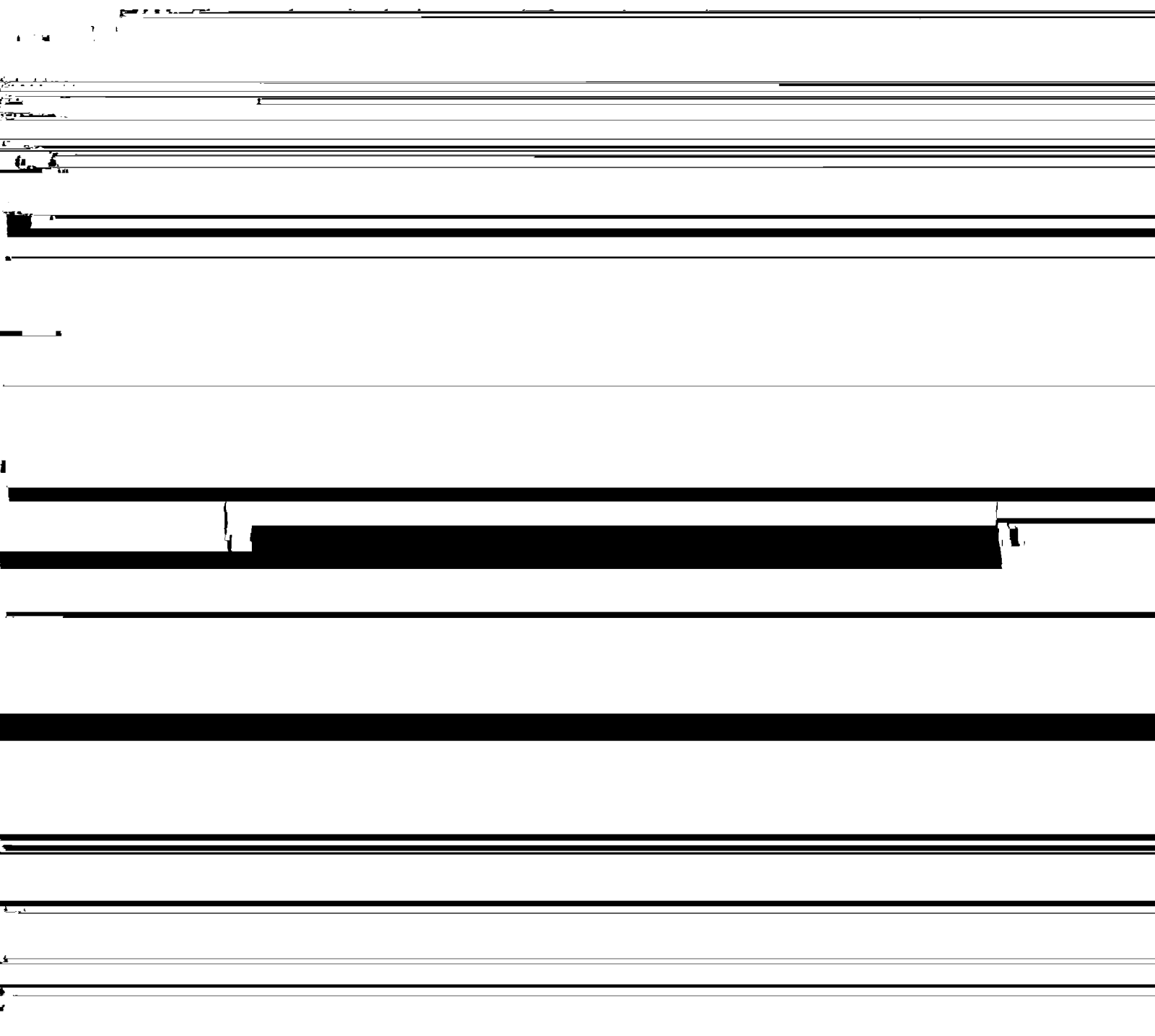
[REDACTED]

[REDACTED]

[REDACTED]

ANSWER: Subject to and notwithstanding the general objections, Respondent's refer
Complaint Counsel to the contract index attached hereto as Exhibit A.

1582. The document attached to this Request for Admissions as Exhibit CX-05098 is
authentic, genuine, and a true and correct copy of an amendment, dated [REDACTED], to CX-



amendment is admissible into evidence in this matter.

ANSWER: Subject to and notwithstanding the general objections, Respondent's refer

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

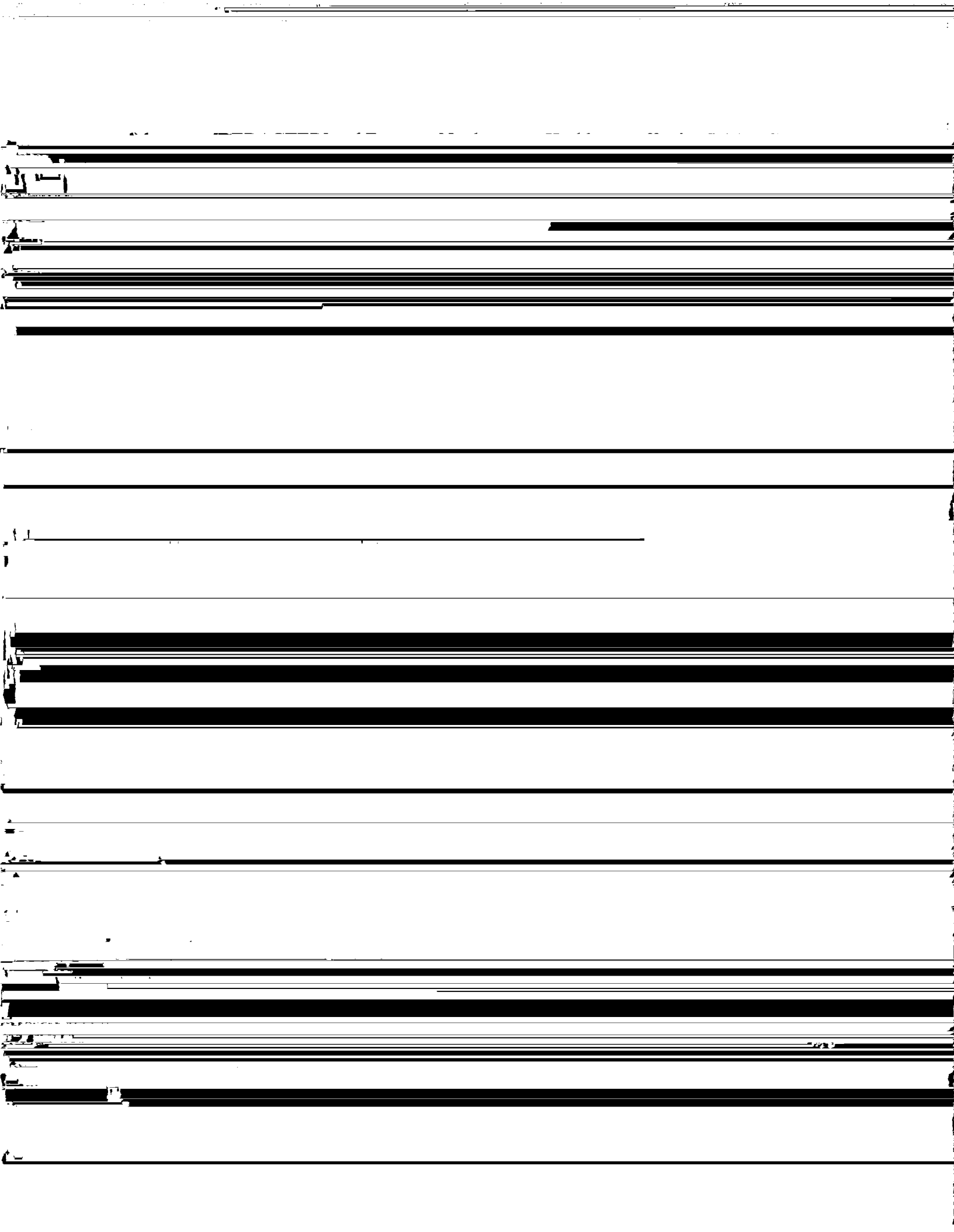
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

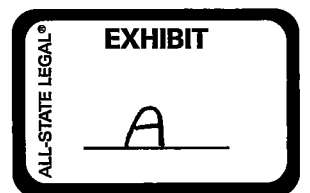
[REDACTED]



CERTIFICATE OF SERVICE

1

REDACTED



REDACTED

