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Attorney for Plaintiff, **

SUPERIOR COURT OF THE STATE OF CALIFORNIA

PLAINTIFF,

VS.

DEFENDANTS.

Case No.

PLAINTIFF'S RESPONSES TO

DEMANDING PARTY: DEFENDANT,

RESPONDING PARTY: PLAINTIFF,

SET NO: ONE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLAINTIFF, (hereinafter Responding Party) makes the following answers and objections to Form Interrogatories, Set One.

PRELIMINARY STATEMENT

These answers and objections are made solely for this action. Each answer is subject to all objections as to competence, relevance, materiality, propriety, answer is subject to all objections as to competence, relevance, materiality, propriety, admissibility, and all other objections and grounds that would require the exclusion of any statement herein if any interrogatory were asked of, or if any

statement contained herein were made by, a witness present and testifying in Court, all of which objections and grounds are expressly reserved and may be interposed at the time of trial.

While these responses are based upon diligent exploration and investigation by Responding Party and Responding Party's counsel, they reflect the current state of Responding Party's knowledge respecting the matters about which inquiry is made. Responding Party has only begun the process of conducting discovery, formal and informal in this action, and has not concluded such discovery. Accordingly, Responding Party has not been able to ascertain all relevant facts herein, and these answers are not intended to be final and conclusive. The information contained herein remains preliminary, and in making these responses, Responding Party reserves the right to amend, supplement, delete from, alter, modify, or otherwise change any answer herein as further discovery may make appropriate, and when Responding Party has ascertained all relevant facts.

The following answers are based on the information presently available to Responding Party and no incidental or implied admissions are intended herein. The fact that Responding Party has answered all or part of any interrogatory should not be taken as an admission that Responding Party accepts or admits the existence of any fact set forth or assumed by such interrogatory, or that such answer constitutes admissible evidence. The fact that Responding Party has answered all or part of any interrogatory is not intended to be and shall not be construed to be a waiver by Responding Party of all or any part of any objection which Responding Party has made to any interrogatory.

RESPONSES TO FORM INTERROGATORIES

Dated: COHEN LAW PARTNERS

By: _____
Joshua C. Cohen
Attorney for Plaintiff