

MASTER LIST OF OBJECTIONS

OBJECTION: The documents requested are obtainable from some other source that is more convenient, less burdensome or less expensive; therefore pursuant to TRCP 192.4(a) Plaintiff will not produce documents responsive to this request.

Subject to such objection(s) and without waiving same, Plaintiff is not responding to this request.

OBJECTION: This request seeks “Work Product” as it is defined in the TEXAS RULES OF CIVIL PROCEDURE §192.5 and as such is not a proper subject matter for discovery.

Subject to such objection(s) and without waiving same, Plaintiff is responds to this request as follows:

OBJECTION: Plaintiff objects to this request as overly broad, burdensome and vague.

OBJECTION: This request seeks information that is irrelevant to the issues of this case and is not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: This request seeks information that is privileged as a trade secret

Subject to such objections and without waiving same, Plaintiff is not responding to this request.

OBJECTION: This request seeks information that is irrelevant to the issues of this case and is not reasonably calculated to lead to the discovery of admissible

OBJECTION: This request improperly seeks to force Plaintiff to marshal evidence in direct violation of TRCP 197.vidence.

OBJECTION: Plaintiff objects to this request as improper under the Texas Rules of Civil Procedure 198.

OBJECTION: this request does not describe an item or category of items with reasonable particularity, is overbroad, unduly burdensome and attempts to force Plaintiff to marshal her evidence. Subject to this objection, and without waiving Plaintiff is not responding to this request.

OBJECTION: Plaintiff objects to this request as a violation of the Texas Rules of Civil Procedure 196.1(a) in that this request requires the creation of a document, not currently in existence. See *GM Corp. v. Gayle*, 951 S.W.2d 469, 475-476 (Tex.1997).

Based on these objections and without waiving same, Plaintiff is not creating documents responsive to this request