

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ANNE ANDERSON, et al.,)
)
 Plaintiffs)
) Civil Action
 v.)
) No. 82-1672-S
 CRYOVAC, INC., et al.,)
)
 Defendants)

PLAINTIFFS' RESPONSE TO DEFENDANT BEATRICE FOODS CO.'S
REQUEST FOR PRODUCTION OF DOCUMENTS

1. Plaintiffs' object to request number one as encompassing attorney work product and materials prepared in preparation of litigation and as being beyond the scope of the Rules of Civil Procedure.

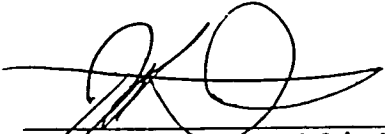
2. Plaintiffs' object to request number two as being vague and beyond the scope of the Rules of Civil Procedure. However, Plaintiffs will agree to the mutual exchange of a summary of the educational and professional background, as well as the publications, of its experts.

3. Plaintiffs object to request number three as being vague, over broad, burdensome, oppressive, and beyond the scope of the Rules of Civil Procedure.

4. Plaintiffs object to request number four as being vague, over broad, burdensome, oppressive, and beyond the scope of the Rules of Civil Procedure.

Dated: September 17, 1985

Respectfully submitted
by their attorney,



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