

- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 60**

Are you aware or have you ever been notified of an Omega sprinkler from a steel piping system that did not exhibit "o" ring swelling, and that when exposed to temperatures at and/or in excess of its activation/triggering temperature, did not activate (1) at a pressure at or below 7 psig in testing; and/or (2) in a field test; and/or (3) in a fire? If so:

- a) identify the Omega and indicate what type of "o" ring it contained;
- b) describe the circumstances under which the Omega did not activate;
- c) indicate at what pressure, if any, the Omega activated (or if it failed to activate altogether, indicate the highest pressure to which the Omega was subjected);
- d) identify the person and/or entity (including your employees and/or consultants) who notified you of the Omega and/or its nonactivation under the circumstances above;
- e) indicate how and when you became aware or received notification of the nonactivation under the circumstances described above;
- f) indicate on what basis and by what criteria it was determined whether "o" ring swelling was present;
- g) detail your response to the notification or awareness;
- h) indicate whether you or anyone else of whom you are aware examined and/or tested the affected sprinkler and/or other sprinklers from that site. If so:
  - i) identify the Omega;

- ii) describe all such tests and/or examinations, and provide a detailed protocol;
- iii) identify the persons and entities involved in setting up and/or conducting each test and/or examination;
- iv) describe and explain the results of each test and/or examination, including all observations and conclusions;
- v) identify the persons and entities involved in evaluating the test results;
- i) identify and describe all communications regarding or relating in any way to the Omega and/or its nonactivation, and/or tests and/or examinations relating thereto, indicating:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication;
- j) explain in full detail why the Omega did not activate.

**INTERROGATORY NO. 61**

Do you allege that any change in the manufacturing process and/or component parts, including any tools, substances or chemicals used in the manufacturing process, renders the Omegas manufactured after a certain date unsusceptible to "o" ring swelling? If so:

- a) describe the alleged change, and identify the Omega makes and models to which the change applies;

- b) indicate the date on which the change was effected;
- c) identify all persons and/or entities involved in effecting the change, describing each such person's role in effecting the change;
- d) indicate whether you or anyone else of whom you are aware has tested and/or examined an Omega manufactured after the change to determine whether it exhibits "o" ring swelling; If so:
  - i) identify the Omega;
  - ii) describe all such tests and/or examinations, and provide a detailed protocol;
  - iii) identify the persons and entities involved in setting up and/or conducting each test or examination;
  - iv) describe and explain the results of each test and/or examination, including all observations and conclusions;
  - v) identify the persons and entities involved in evaluating the test and/or examination results;
- e) identify and describe all communications regarding or relating in any way to the change and/or tests and/or examinations relating thereto, indicating:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 62**

Do you contend that adhesion of an Omega sprinkler's "o" ring to the plunger housing or main housing of the Omega may cause the Omega to:

- a) leak and/or weep;
- b) activate prematurely and/or unnecessarily;
- c) fail to activate at 7 psig or below in testing (when the Omega is exposed to its activation/triggering temperature); and/or
- d) fail to activate in field testing (when the Omega is exposed to its activation/triggering temperature); and/or
- e) fail to activate in a fire (when the Omega is exposed to its activation/triggering temperature). If so:
  - i) explain the basis for your contention;
  - ii) identify the Omegas in which "o" ring adhesion causes or may cause (a), (b), (c), and/or (d), above;
  - iii) identify the systems in which "o" ring adhesion causes or may cause (a), (b), (c) and/or (d), above;
  - iv) identify the Omegas in which "o" ring adhesion causes or may cause (a), (b), (c) and/or (d), above;
  - v) describe the circumstances under which "o" ring adhesion causes or may cause (a), (b), (c) and/or (d), above.

**INTERROGATORY NO. 63**

Have you or anyone of whom you are aware ever determined or alleged that an

Omega exhibits "o" ring adhesion? If so:

- a) identify the Omega, and indicate what type of "o" ring it contained (EPDM, silicone, or other);
- b) identify the person and/or entity that made the determination or allegation;
- c) indicate the date on which the determination or allegation was made;
- d) describe the methods and criteria used to determine and confirm the existence of "o" ring adhesion;
- e) identify the person and/or entity (including your employees or consultants) who notified you of the alleged "o" ring adhesion;
- f) indicate how and when you were notified of the alleged "o" ring adhesion;
- g) detail your response to the notification or awareness;
- h) did you or anyone else of whom you are aware test and/or examine the Omega and/or any other sprinkler from the same site? If so:
  - i) identify the Omega;
  - ii) describe all such tests and/or examinations, and provide a detailed protocol;
  - iii) identify the persons and entities involved in setting up and/or conducting each test and/or examination;
  - iv) describe and explain the results of each test and/or examination, including all observations and conclusions;
  - v) identify the persons and entities involved in evaluating the test and/or examination results;

- i) identify and describe all communications regarding or relating in any way to the Omega, the alleged "o" ring adhesion, the examination and/or conclusion, and any tests and/or examinations relating thereto, indicating:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication;
- j) With respect to each such Omega, indicate whether you or anyone of whom you are aware contend that the "o" ring adhesion caused the Omega to:
  - i) leak and/or weep;
  - ii) prematurely and/or unnecessarily activate;
  - iii) fail to activate at 7 psig or below in testing (when exposed to its activation/triggering temperature);
  - iv) fail to activate in field testing (when exposed to its activation/triggering temperature);
  - v) fail to activate in a fire (when exposed to its activation/triggering temperature).

If so, explain fully the basis for your contention or, if not your contention, identify the person and/or entity who so contended, and explain your understanding of the basis for that contention.

**INTERROGATORY NO. 64**

Do you allege that any change in the manufacturing process and/or component parts, including any tools, substances or chemicals used in the manufacturing process, renders the Omegas manufactured after a certain date unsusceptible to "o" ring adhesion? If so:

- a) describe the alleged change, and identify the Omega makes and models to which the change applies;
- b) indicate the date on which the change was effected;
- c) identify all persons and/or entities involved in effecting the change, describing each such person's role in effecting the change;
- d) indicate whether you or anyone else of whom you are aware has tested and/or examined an Omega manufactured after the change to determine whether it exhibits "o" ring adhesion; If so:
  - i) identify the Omega;
  - ii) describe all such tests and/or examinations, and provide a detailed protocol;
  - iii) identify the persons and entities involved in setting up and/or conducting each test or examination;
  - iv) describe and explain the results of each test and/or examination, including all observations and conclusions;
  - v) identify the persons and entities involved in evaluating the test and/or examination results;
- e) identify and describe all communications regarding or relating in any way to

the change and/or tests and/or examinations relating thereto, indicating:

- i) the date on which the communication took place;
- ii) the persons and/or entities to and from whom the communication was directed;
- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 65**

Do you contend or are you aware of any fires in which all Omegas exposed to temperatures at or in excess of their activation/triggering temperature activated? If so:

- a) identify each Omega;
- b) indicate when, where and how the fire occurred;
- c) what was the system pressure was (in psig) at the time of the fire and/or activation;
- d) indicate how long after the Omega was first exposed to its activation/triggering temperature it activated;
- e) indicate whether anyone sustained or allegedly sustained bodily injury as a result of or in association with the fire (including injuries sustained or allegedly sustained in attempting to escape the fire). If so:
  - i) identify the injured person;
  - ii) indicate how the injury was or was alleged to have been sustained;
  - iii) indicate whether a suit, claim, or demand was ever made against you or in which you were implicated relating to the incident or injury; provide

- details of same;
- f) indicate whether anyone died or allegedly died as a result of or in association with the fire (including death incurred or allegedly incurred in attempting to escape the fire). If so:
- i) identify the decedent;
  - ii) indicate how and where the death occurred;
  - iii) indicate whether a suit, claim, or demand was ever made against you or in which you were implicated relating to the incident or death; provide details of same;
- g) indicate whether any property was or allegedly was damaged, lost or destroyed as a result of or in association with the fire (including damage sustained or allegedly sustained in attempting to remove the property from the fire, or in attempting to put out the fire). If so:
- i) identify the owner of the property;
  - ii) indicate how the property was or allegedly was damaged;
  - iii) indicate the value or alleged value of the property;
  - iv) indicate whether a suit, claim, or demand was ever made against you or in which you were implicated relating to the incident or damage; provide details of same;
- h) indicate whether the Omega was fitted with a "helper spring;"
- i) indicate when and how you became aware of the fire and/or the activation, including from whom you received the notification;

- j) identify and describe all communications regarding or relating in any way to the fire and/or activation, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication;
- k) indicate whether you or anyone else tested and/or examined any Omega that allegedly activated in a fire, or any other sprinkler from the same site? If so:
  - i) identify the sprinkler;
  - ii) describe the tests and/or examinations, and provide a detailed protocol;
  - iii) identify the persons and entities involved in setting up and/or conducting the tests and/or examinations;
  - iv) describe and explain the results of the tests and/or examinations, including all observations and conclusions;
  - v) identify the persons and entities involved in evaluating the test and/or examination results;
- l) indicate whether the Omega "o" ring was examined for swelling and/or adhesion. If so:
  - i) indicate whether swelling and/or adhesion was present;
  - ii) indicate on what basis and by what criteria it was determined whether the "o" ring was swollen or adhered;

- iii) identify all persons and/or entities involved in determining whether the "o" ring was swollen or adhered;
- m) indicate whether the Omega and/or the system from which it came was tested and/or examined for "stop leak" or any other leakage prevention substance. If so:
  - i) indicate whether "stop leak" or any other such substance was present;
  - ii) indicate on what basis and by what criteria it was determined whether "stop leak" or any other such substance was present;
  - iii) identify all persons and/or entities involved in determining whether "stop leak" or any other such substance was present;
- n) indicate whether the Omega was examined for dezincification. If so:
  - i) indicate whether dezincification had occurred;
  - ii) indicate on what basis and by what criteria it was determined whether dezincification had occurred;
  - iii) identify all persons and/or entities involved in determining whether dezincification had occurred;

**INTERROGATORY NO. 66**

Identify and describe all tests and/or examinations conducted by you or anyone on your behalf on Omega sprinklers. For each test:

- a) identify the sprinklers tested;
- b) describe the tests and provide a detailed protocol and the date on which each test was conducted;

- c) identify the persons and entities involved in:
  - i) drafting and/or conceiving the protocol;
  - ii) setting up and/or conducting the tests;
- d) describe and explain the results of the tests, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test results;
- f) identify and describe all communications relating in any way to any such tests and/or test results, indicating:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 67**

Have you or anyone of whom you are aware ever performed the "load on heat responsive element test" according to the testing protocol in UL 199 on an Omega sprinkler?

If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;

- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 68**

Have you or anyone of whom you are aware ever performed the "strength of heat responsive element test" according to the testing protocol in UL 199 on an Omega sprinkler?

If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;

- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 69**

Have you or anyone of whom you are aware ever performed the "leakage test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was

- directed;
- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 70**

Have you or anyone of whom you are aware ever performed the "hydrostatic strength test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 71**

Have you or anyone of whom you are aware ever performed the "30-day leakage test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 72**

Have you or anyone of whom you are aware ever performed the "water hammer test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;

- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 73**

Have you or anyone of whom you are aware ever performed the "operating temperature (bath) test" according to the testing protocol in UL 199 on an Omega sprinkler?

If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the

- test;
- d) describe and explain the results of the test, including all observations and conclusions;
  - e) identify the persons and entities involved in evaluating the test;
  - f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
    - i) the date on which the communication took place,
    - ii) the persons and/or entities to and from whom the communication was directed;
    - iii) the nature and content of the communication;
    - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 74**

Have you or anyone of whom you are aware ever performed the "sensitivity tests" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;

- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 75**

Have you or anyone of whom you are aware ever performed the "operation - lodgement test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was

- directed;
- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 76**

Have you or anyone of whom you are aware ever performed the "flow endurance test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 77**

Have you or anyone of whom you are aware ever performed the "operation - cold soldering test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 78**

Have you or anyone of whom you are aware ever performed the "high temperature - test for uncoated sprinklers" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 79**

Have you or anyone of whom you are aware ever performed the "high temperature - test for coated sprinklers" according to the testing protocol in UL 199 on an Omega sprinkler?

If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;

- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 80**

Have you or anyone of whom you are aware ever performed the "strength of frame test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;

- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 81**

Have you or anyone of whom you are aware ever performed the "impact resistance test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;

- ii) the persons and/or entities to and from whom the communication was directed;
- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 82**

Have you or anyone of whom you are aware ever performed the "rough usage test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 83**

Have you or anyone of whom you are aware ever performed the "vibration test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 84**

Have you or anyone of whom you are aware ever performed the "calibration test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;

- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 85**

Have you or anyone of whom you are aware ever performed the "10 pan distribution test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;

- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 86**

Have you or anyone of whom you are aware ever performed the "16 pan distribution test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to

the testing or the Omega tested, including:

- i) the date on which the communication took place;
- ii) the persons and/or entities to and from whom the communication was directed;
- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 87**

Have you or anyone of whom you are aware ever performed the "water distribution test - conventional (old style) sprinklers" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was

directed;

- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 88**

Have you or anyone of whom you are aware ever performed the "100 pan distribution test - sidewall sprinklers" according to the testing protocol in UL 199 on an Omega sprinkler?

If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 89**

Have you or anyone of whom you are aware ever performed the "350 pound wood crib fire test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 90**

Have you or anyone of whom you are aware ever performed the "10-day corrosion test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;

- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 91**

Have you or anyone of whom you are aware ever performed the "30-day corrosion test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;

- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 92**

Have you or anyone of whom you are aware ever performed the "90-day moist air test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to

the testing or the Omega tested, including:

- i) the date on which the communication took place;
- ii) the persons and/or entities to and from whom the communication was directed;
- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

### **INTERROGATORY NO. 93**

Have you or anyone of whom you are aware ever performed the "stress-corrosion cracking of brass sprinkler parts test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was

directed;

- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 94**

Have you or anyone of whom you are aware ever performed the "stress-corrosion cracking of stainless sprinkler parts test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 95**

Have you or anyone of whom you are aware ever performed the "operational tests on sprinklers incorporating gaskets or "o" ring seals" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 96**

Have you or anyone of whom you are aware ever performed the "vacuum test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 97**

Have you or anyone of whom you are aware ever performed the "elastomeric parts test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the

test;

- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 98**

Have you or anyone of whom you are aware ever performed the "freezing test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;

- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 99**

Have you or anyone of whom you are aware ever performed the "fire test for extended coverage sprinklers intended for light hazard occupancies" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;

- ii) the persons and/or entities to and from whom the communication was directed;
- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 100**

Have you or anyone of whom you are aware ever performed the "wall wetting test for extended coverage sprinklers intended for light hazard occupancies" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;

- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 101**

Have you or anyone of whom you are aware ever performed the "evaporation test for sprinkler coatings" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 102**

Have you or anyone of whom you are aware ever performed the "cycling tests for flow control (FC) sprinklers" according to the testing protocol in UL 199 on an Omega

sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 103**

Have you or anyone of whom you are aware ever performed the "piled stock fire test for flow control (FC) sprinklers" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and

- the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
  - d) describe and explain the results of the test, including all observations and conclusions;
  - e) identify the persons and entities involved in evaluating the test;
  - f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
    - i) the date on which the communication took place;
    - ii) the persons and/or entities to and from whom the communication was directed;
    - iii) the nature and content of the communication;
    - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 104**

Have you or anyone of whom you are aware ever performed the "piled stock fire test for extended coverage sprinklers intended for ordinary hazard occupancies" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;

- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 105**

Have you or anyone of whom you are aware ever performed the "distribution tests for extended coverage sprinklers intended for ordinary hazard occupancies" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;

- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 106**

Have you or anyone of whom you are aware ever performed the "high temperature exposure test for flow control (FC) sprinklers" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;

- ii) the persons and/or entities to and from whom the communication was directed;
- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 107**

Have you or anyone of whom you are aware ever performed the "production leakage test" according to the testing protocol in UL 199 on an Omega sprinkler? If so:

- a) identify the Omega;
- b) indicate what version (by date) of UL 199 the testing protocol followed, and the date on which each test was performed;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 108**

Have you ever tested an Omega that, upon being exposed to its activation/triggering temperature, did not activate within 5 seconds at a pressure at or below 7 psig pressure?

If so:

- a) identify the Omega;
- b) explain why it failed to activate;
- c) identify the persons and entities involved in setting up and/or conducting the test;
- d) describe and explain the results of the test, including all observations and conclusions;
- e) identify the persons and entities involved in evaluating the test;
- f) identify and describe all communications regarding or relating in any way to the testing or the Omega tested, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 109**

Indicate whether you have attended or been present at any meetings or discussions, or issued or received any communications, in which the following were discussed:

- a) failure of Omega sprinklers to activate in testing or in a fire;

- b) dezincification as a cause or possible cause of Omega non-activation in testing or in a fire;
- c) stop leak or other leak prevention substance as a cause or possible cause of Omega non-activation in testing or in a fire;
- d) "o" ring swelling as a cause or possible cause of Omega non-activation in testing or in a fire;
- e) "o" ring adhesion as a cause or possible cause of Omega non-activation in testing or in a fire;
- f) excessive hydrocarbons as a cause or possible cause of Omega non-activation in testing or in a fire;
- g) improper system design as a cause or possible cause of Omega non-activation in testing or in a fire;
- h) UL listing or certification of any Omega sprinkler or sprinkler assistive device such as the "helper spring;"
- i) FM listing or certification of any Omega sprinkler or sprinkler assistive device such as the "helper spring;"
- j) NFPA 13 requirements or applicability with respect to fire sprinklers or sprinkler systems;
- k) NFPA 25 requirements or applicability with respect to fire sprinklers or sprinkler systems;
- l) UL 199 requirements or applicability with respect to fire sprinklers or sprinkler systems;

- m) UL 1626 requirements or applicability with respect to fire sprinklers or sprinkler systems. If so, for each such meeting, discussion, and communication, provide:
- i) the date on which the meeting, discussion or communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed or, if a meeting or discussion, identify all persons who were present and/or participated;
  - iii) the nature and content of the communication;

**INTERROGATORY NO. 110**

Have you ever been notified of any problem, potential problem, complaint or concern (including any reports of nonactivation or possibility of nonactivation) regarding or in any way relating to an Omega sprinkler? If so:

- a) identify who notified you;
- b) indicate how and when you were notified;
- c) describe and explain the contents of the notification;
- d) identify all persons who have knowledge of the notification and/or the problem, potential problem, complaint or concern;
- e) describe and explain your response to the notification;
- f) did you or anyone else of whom you are aware examine and/or test the Omega about which you were notified of any problem, potential problem, complaint or concern, the system in which it was installed, and/or any other sprinkler from the same site? If so:

- i) identify the sprinkler;
  - ii) describe the tests and/or examinations, and provide a detailed protocol;
  - iii) identify the persons and entities involved in setting up and/or conducting the tests and/or examinations;
  - iv) describe and explain the results of the tests and/or examinations, including all observations and conclusions;
  - v) identify the persons and entities involved in evaluating the test and/or examination results;
- g) identify and describe all communications regarding or relating in any way to the notification, the sprinkler, and/or any the testing and/or examination in part f), including:
- i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 111**

Have you notified any person and/or entity of any problem, potential problem, complaint or concern (including any reports of nonactivation or possibility of nonactivation) regarding or in any way relating to an Omega sprinkler? If so:

- a) identify who you notified, and all persons and/or entities who received the notification or copies thereof;

- b) indicate how and when you notified the persons and/or entities identified in your response to part (a) above;
- c) describe and explain the contents of the notification;
- d) identify all persons who have knowledge of the notification and/or the problem, potential problem, complaint or concern, including who drafted, reviewed and/or approved the notification;
- e) did you receive any response to the notification? If so:
  - i) identify the person and/or entity from whom you received a response;
  - ii) indicate how and when you received the response;
  - iii) describe and explain the contents of the response;
- f) identify and describe all communications regarding or relating in any way to the notification and/or response, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 112**

Indicate whether you ever requested any information from any sprinkler contractor or sprinkler owner regarding any Omega sprinkler. If so:

- a) identify the persons and/or entities from whom you requested information;
- b) indicate how and when you requested the information;

- c) describe and explain what information you requested;
- d) identify all persons who have knowledge of the request for information, including those who drafted, reviewed and/or approved the request for information;
- e) did you receive any response to the request for information? If so:
  - i) identify the person and/or entity from whom you received a response;
  - ii) indicate how and when you received the response;
  - iii) describe and explain the contents of the response;
- f) identify and describe all communications regarding or relating in any way to the request for information and/or the response to that request, including:
  - i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 113**

Have you or anyone on your behalf provided (either by sale or without charge) sprinklers to anyone to replace some or all of the Omegas installed in a particular location? If so, indicate the total number of Omegas replaced, and the total value of the replacement (labor plus cost of sprinklers, and any other associated expenses).

**INTERROGATORY NO. 114**

With respect to each location in which you provided (either by sale or without charge)

sprinklers to anyone to replace some or all of the Omegas that were installed there:

- a) identify the location;
- b) indicate what make and/or model Omegas were replaced, and the quantity of each replaced;
- c) indicate what make and/or model sprinkler were provided as a replacement, and the quantity of each provided;
- d) identify the person and/or entity to whom you provided the replacements;
- e) describe and explain the circumstances under which you provided the replacements;
- f) identify the person and/or entity who paid the cost of the replacement;
- g) indicate the cost of the replacement;
- h) describe and explain what the replacement involved;
- i) did you or anyone else of whom you are aware examine and/or test the Omega that was replaced, the system in which it was installed, and/or any other sprinkler from the same site? If so:
  - i) identify the sprinkler;
  - ii) describe the tests and/or examinations, and provide a detailed protocol;
  - iii) identify the persons and entities involved in setting up and/or conducting the tests and/or examinations;
  - iv) describe and explain the results of the tests and/or examinations, including all observations and conclusions;
  - v) identify the persons and entities involved in evaluating the test and/or

examination results;

- j) identify and describe all communications regarding or relating in any way to the replacement of the sprinklers, the sprinkler that was replaced, the replacement sprinkler, and/or any the testing and/or examination the replaced sprinkler, including:
- i) the date on which the communication took place;
  - ii) the persons and/or entities to and from whom the communication was directed;
  - iii) the nature and content of the communication;
  - iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 115**

Have you ever tested Omega sprinklers from a building or structure and indicated to the building owner/operator or anyone else that all Omegas activated properly? If so:

- a) identify each Omega you tested;
- b) identify the location in which the Omega had been installed;
- c) for each location, indicate how many Omegas were installed there prior to testing, and how many were tested;
- d) describe the tests and/or examinations, and provide a detailed protocol;
- e) identify the persons and entities involved in setting up and/or conducting the tests and/or examinations;
- f) describe and explain the results of the tests and/or examinations, including all observations and conclusions;

- g) identify the persons and entities involved in evaluating the test and/or examination results;
- h) did you or anyone else of whom you are aware examine and/or test the system in which it was installed? If so:
  - i) describe the tests and/or examinations, and provide a detailed protocol;
  - ii) identify the persons and entities involved in setting up and/or conducting the tests and/or examinations;
  - iii) describe and explain the results of the tests and/or examinations, including all observations and conclusions;
  - iv) identify the persons and entities involved in evaluating the test and/or examination results;
- i) did any person or entity other than you examine and/or test sprinklers from the same site? If so:
  - i) identify the sprinkler;
  - ii) describe the tests and/or examinations, and provide a detailed protocol;
  - iii) identify the persons and entities involved in setting up and/or conducting the tests and/or examinations;
  - iv) describe and explain the results of the tests and/or examinations, including all observations and conclusions;
  - v) identify the persons and entities involved in evaluating the test and/or examination results;
- j) identify and describe all communications regarding or relating in any way to

the sprinklers, the testing and/or the results, including:

- i) the date on which the communication took place;
- ii) the persons and/or entities to and from whom the communication was directed;
- iii) the nature and content of the communication;
- iv) identify all persons and/or entities present during the communication.

**INTERROGATORY NO. 116**

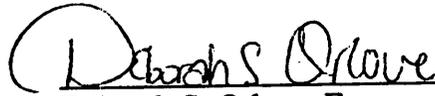
Identify each person whom you expect to call as an expert witness at trial or hearing in this matter, and provide the following information:

- a) the subject matter on which the expert is expected to testify;
- b) the substance of the facts and opinions to which the expert is expected to testify;
- c) provide a summary of the grounds for each opinion to which the expert is expected to testify.

**INTERROGATORY NO. 117**

Identify each person whom you expect to call as a fact witness at trial or hearing in this matter, and provide the following information:

- a) the subject matter on which the witness is expected to testify;
- b) the substance of the facts to which the witness is expected to testify.



Deborah S. Orlove, Esq.  
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DATED: April 20, 1998

centralinterrog.dso

**CERTIFICATE OF SERVICE**

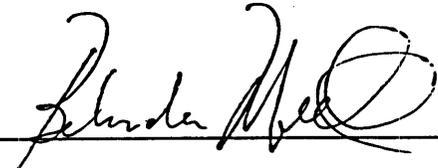
The undersigned hereby certifies that on this date, Complaint Counsel's First Set of Interrogatories to Respondents Central Sprinkler Corp. and Central Sprinkler Co. and First Requests for Production of Documents and Things to Respondents Central Sprinkler Corp. and Central Sprinkler Co. were deposited in the United States Mail, via certified delivery, postage pre-paid, addressed to the following:

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Attorneys for Central Sprinkler Corporation and  
Central Sprinkler Company

  
\_\_\_\_\_

Dated: 4/20/98