

B. As used herein, the term “agreement” shall mean each and every agreement, contract, arrangement or understanding, oral or written, made or proposed, whenever and by whomever made or proposed, of whatever kind or character, concerning a specified subject matter.

C. As used herein, the term “any” and the term “all” are intended to mean “any and all.”

D. The term "communication" as used herein includes, without limitation, the following: conversations, telephone conversations, e-mails, statements, discussions, debates, arguments, disclosures, interviews, consultation and every other manner of oral utterance, or electronic or written transmittals of information or messages.

E. As used herein, the term “concerning” means regarding, referring to, describing, evidencing or constituting.

F. The term “correspondence” shall mean any communication, whether oral, written, electronic or implied.

G. As used herein, the term “document” is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34, and is expressly intended to encompass any information compiled or retained in electronic format. A draft or non-identical copy is a separate document within the meaning of this term.

H. As used herein, the term “Driver Logistics” shall mean and refer to Driver Logistics Services, Inc. and any business entity owned, operated, or managed by Driver Logistics Services, Inc., any parent, subsidiary, division, affiliate, or predecessor-in-interest of, Driver Logistics Services, Inc. and the officers, directors, employees, parents, subsidiaries, divisions, affiliates, agents, counsel, attorneys, and other representatives of each such entity.

I. The term "fact" as used herein includes, without limitation, the following: circumstances, occurrences, occasions, events, incidences, oral communications, writings, episodes, experiences, happenings, transactions and all manner of other affairs, matters or things.

J. As used herein, the term "GAF" shall mean and refer to Building Materials Corp. of America d/b/a GAF Materials Corp., and any business entity owned, operated, or managed by GAF Materials Corp., any parent, subsidiary, division, affiliate, or predecessor-in-interest of, GAF Materials Corp. and the officers, directors, employees, parents, subsidiaries, divisions, affiliates, agents, counsel, attorneys, and other representatives of each such entity.

K. The terms "identify," or "identity" mean, with respect to a natural person, to set forth his or her full name, present or last known business and residence address and phone number, his or her employer, the position or positions held with that employer and a description of the job responsibilities of such person.

L. As used herein, the term "National Union" shall mean and refer to National Union Fire Insurance Company of Pittsburgh, PA, and any business entity owned, operated, or managed by, National Union Fire Insurance Company of Pittsburgh, PA and the officers, directors, employees, parents, subsidiaries, divisions, affiliates, agents, counsel, attorneys, and other representatives of each such entity.

M. As used herein, the term "or" and the term "and" shall mean "and/or" and vice-versa.

N. As used herein, the term "Penske" shall mean and refer to Penske Truck Leasing Corp. and any business entity owned, operated, or managed by Penske Truck Leasing Corp., any parent, subsidiary, division, affiliate, or predecessor-in-interest of, Penske Truck Leasing Corp. and the officers, directors, employees, parents, subsidiaries, divisions, affiliates, agents, counsel, attorneys, and other representatives of each such entity.

O. As used herein, the term “person” includes any natural person, any business, legal or governmental entity or association.

P. As used herein, the term “Personal Injury Defendants” shall mean and refer collectively to Carlo Zalewski, GAF, Driver Logistics and Penske.

Q. As used herein, the term “Plaintiffs” shall mean and refer collectively to Marcia Rhodes, Harold Rhodes individually and Harold Rhodes on behalf of his minor child and next friend Rebecca Rhodes.

R. As used herein, the term “representative” shall mean any present or former partners, directors, officers, attorneys, agents or employees, as applicable, and all other persons acting on behalf of any particular person.

S. As used herein, the term “Underlying Action” shall mean the personal injury action filed by Plaintiffs against GAF, Driver Logistics, Carlo Zalewski and Penske on or about July 12, 2002.

T. As used herein, the terms “you,” “your,” “yours,” or “AIGDC” shall mean and refer to AIG Domestic Claims, Inc. f/k/a AIG Technical Services, Inc., and any business entity owned, operated, or managed by, AIG Domestic Claims, Inc. and the officers, directors, employees, parents, subsidiaries, divisions, affiliates, predecessors, agents, counsel, attorneys, and other representatives of each such entity.

U. As used herein, the term “Zurich” shall mean, Zurich American Insurance Company and any business entity owned, operated, or managed by Zurich American Insurance Company, any parent, subsidiary, division, affiliate, or predecessor-in-interest of, Zurich American Insurance Company and the officers, directors, employees, parents, subsidiaries, divisions, affiliates, agents, counsel, attorneys, and other representatives of each such entity.

V. In case of doubt as to the scope of a clause including “and,” “or,” “any,” “all,” “each,” or “every,” the intended meaning is inclusive rather than exclusive.

W. Any word written in the singular also includes the plural and vice-versa.

INSTRUCTIONS

A. Your attention is called to the duty imposed by Massachusetts Rule of Civil Procedure 26(e) to supplement your answers to these interrogatories with respect to information hereinafter acquired.

B. If any of these interrogatories cannot be answered in full, then the respondent should answer to the extent possible, specify each reason for its inability to answer the remainder and state whatever information or knowledge it has concerning the unanswered portion. In answering the Interrogatories, furnish such information as is available to respondent, regardless of whether or not it is based on personal knowledge or records of respondent, its agents or representatives, or from others or others' records, regardless of source.

C. If any of these interrogatories call for the identification of documents or oral communications which you contend are protected by the attorney-client privilege or another claimed privilege or by the work product rule, furnish the information identifying such document or oral communication nevertheless (except for a summary of contents or substance) and also state all reasons for your claim that the document or oral communication is so privileged or protected.

INTERROGATORIES

Interrogatory No. 1

Please identify who is responding to these interrogatories and identify all individuals consulted in the preparation of your answers to these interrogatories. Include in your response the name, official title and job responsibilities of each such person.

Interrogatory No. 2

Please identify by name, employer, address and qualifications, each person you and/or National Union retained and/or relied upon as an expert in connection with the Underlying Action, including but not limited to anyone called as an expert witness at the trial of the Underlying Action, and for each such person, state the subject matter of any opinions formed and/or advice given by such person, and provide a summary of the grounds and the materials relied upon for all such opinions and/or advice.

Interrogatory No. 3

Please identify each individual who was assigned to or supervised anyone assigned to AIGDC File # 169-151612 and any related files. Your response should include the official title and a description of the role each individual played with respect to AIGDC File # 169-151612 and/or any related files.

Interrogatory No. 4

Please identify every person with knowledge or information concerning the Accident, the Plaintiffs and/or the Underlying Action. Your response should include the official title and a description of the role each individual played with respect to the Accident, the Plaintiffs and/or the Underlying Action.

Interrogatory No. 5

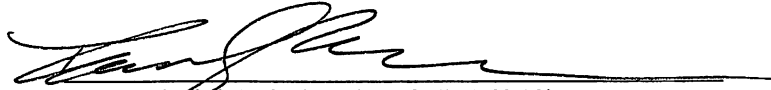
Identify by name, employer, address and qualifications, each person you expect to call as an expert witness at the trial of this action and for each such person:

- a. State the subject matter on which such person is expected to testify;
- b. State the substance of the facts and opinions to which each such person is expected to testify; and

c. Provide a summary of the grounds and the materials relied upon for each such opinion.

MARCIA RHODES, HAROLD RHODES,
INDIVIDUALLY, HAROLD RHODES,
ON BEHALF OF HIS MINOR CHILD
AND NEXT FRIEND, REBECCA RHODES,

By their attorneys,



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DATED: April 8, 2005

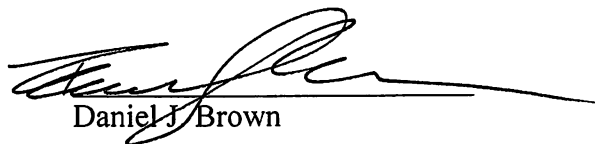
CERTIFICATE OF SERVICE

Counsel for plaintiffs hereby certifies that a copy of the foregoing document was served via process server to all parties:

AIG Domestic Claims, Inc.
f/k/a AIG Technical Services, Inc.
c/o United States Corporation Co.
84 State Street
Boston, MA 02104

National Union Fire Insurance Company
of Pittsburgh, PA
c/o Massachusetts Division of Insurance
Legal Department
One South Station
Boston, MA 02110

Zurich American Insurance Company
c/o Massachusetts Division of Insurance
Legal Department
One South Station
Boston, MA 02110



Daniel J. Brown

DATED: April 8, 2005
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