UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, ET AL	:	
	:	
VS.	:	C.A. NO. 2004-312 L
	:	
JEFFREY DERDERIAN, ET AL	:	

ANSWER OF DEFENDANT DANIEL BICEHELE TO PLAINTIFFS' COMPLAINT

PARTIES

Plaintiffs

1. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 1 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

2. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 2 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

3. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 3 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

4. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 4 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

5. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 5 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

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6. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 6 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

7. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 7 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

8. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 8 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

9. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 9 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

10. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 10 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

11. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 11 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

12. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 12 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

13. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 13 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

14. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 14 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

15. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 15 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

16. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 16 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

17. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 17 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

18. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 18 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

19. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 19 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

20. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 20 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

21. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 21 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

22. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 22 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

23. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 23 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

24. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 24 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

25. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 25 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

26. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 26 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

27. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 27 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

28. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 28 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

29. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 29 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

30. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 30 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

31. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 31 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

32. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 32 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

33. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 33 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

34. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 34 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

35. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 35 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

36. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 36 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

37. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 37 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

38. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 38 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

39. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 39 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

40. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 40 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

41. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 41 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

42. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 42 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

43. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 43 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

44. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 44 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

45. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 45 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

46. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 46 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

47. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 47 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

48. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 48 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

49. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 49 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

50. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 50 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

51. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 51 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

52. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 52 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

53. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 53 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

54. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 54 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

55. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 55 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

56. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 56 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

57. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 57 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

58. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 58 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

59. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 59 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

60. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 60 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

61. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 61 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

62. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 62 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

63. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 63 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

64. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 64 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

65. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 65 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

66. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 66 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

67. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 67 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

68. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 68 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

69. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 69 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

70. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 70 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

71. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 71 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

72. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 72 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

73. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 73 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

74. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 74 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

75. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 75 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

76. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 76 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

77. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 77 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

78. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 78 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

79. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 79 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

80. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 80 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

81. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 81 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

82. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 82 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

83. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 83 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

84. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 84 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

85. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 85 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

86. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 86 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

87. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 87 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

88. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 88 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

89. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 89 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

90. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 90 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

91. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 91 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

92. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 92 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

93. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 93 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

94. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 94 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

95. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 95 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

96. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 96 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

97. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 97 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

98. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 98 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

99. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 99 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

100. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 100 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

101. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 101 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

102. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 102 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

103. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 103 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

104. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 104 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

105. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 105 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

106. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 106 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

107. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 107 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

108. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 108 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

109. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 109 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

110. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 110 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

111. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 111 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

112. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 112 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

113. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 113 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

114. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 114 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

115. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 115 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

116. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 116 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

117. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 117 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

118. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 118 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

119. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 119 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

120. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 120 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

121. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 121 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

122. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 122 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

123. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 123 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

124. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 124 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

125. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 125 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

126. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 126 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

127. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 127 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

128. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 128 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

129. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 129 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

130. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 130 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

131. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 131 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

132. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 132 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

133. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 133 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

134. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 134 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

135. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 135 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

136. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 136 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

137. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 137 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

138. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 138 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

139. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 139 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

140. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 140 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

141. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 141 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

142. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 142 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

143. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 143 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

144. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 144 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

145. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 145 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

146. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 146 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

147. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 147 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

148. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 148 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

149. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 149 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

150. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 150 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

151. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 151 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

152. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 152 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

153. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 153 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

154. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 154 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

155. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 155 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

156. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 156 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

157. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 157 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

158. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 158 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

159. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 159 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

160. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 160 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

161. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 161 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

162. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 162 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

163. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 163 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

164. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 164 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

165. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 165 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

166. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 166 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

167. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 167 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

168. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 168 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

169. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 169 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

170. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 170 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

171. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 171 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

172. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 172 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

173. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 173 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

174. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 174 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

175. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 175 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

176. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 176 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

177. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 177 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

178. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 178 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

179. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 179 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

180. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 180 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

181. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 181 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

182. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 182 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

183. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 183 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

184. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 184 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

185. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 185 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

186. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 186 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

187. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 187 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

188. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 188 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

189. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 189 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

190. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 190 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

191. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 191 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

192. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 192 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

193. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 193 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

194. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 194 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

195. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 195 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

196. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 196 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

197. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 197 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

198. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 198 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

199. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 199 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

200. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 200 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

201. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 201 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

202. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 202 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

203. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 203 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

204. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 204 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

205. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 205 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

206. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 206 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

207. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 207 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

208. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 208 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

209. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 209 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

210. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 210 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

211. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 211 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

212. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 212 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

213. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 213 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

214. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 214 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

215. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 215 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

216. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 216 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

217. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 217 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

218. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 218 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

219. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 219 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

220. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 220 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

221. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 221 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

222. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 222 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

223. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 223 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

224. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 224 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

225. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 225 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

226. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 226 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

GENERAL ALLEGATIONS AS TO ALL DEFENDANTS

271. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 271 of Plaintiffs' Complaint at this time.

JEFFREY DERDERIAN

272. Defendant Daniel Biechele incorporates by reference his answers to all prior

Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

273. Defendant Daniel Biechele is without knowledge or information as to Jeffrey Derderian's residence as set forth in Paragraph 273 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 273 of Plaintiffs' Complaint at this time.

274. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 274 of Plaintiffs' Complaint at this time.

275. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 275 of Plaintiffs' Complaint at this time.

276. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 276 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

277. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 277 of Plaintiffs' Complaint at this time.

278. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 278 of Plaintiffs' Complaint at this time.

279. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 279 of Plaintiffs' Complaint at this time.

COUNT I
JEFFREY DERDERIAN—NEGLIGENCE

280. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

281. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my

privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 281 of Plaintiffs' Complaint at this time.

COUNT II
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

282. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

283. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 283 of Plaintiffs' Complaint at this time.

MICHAEL DERDERIAN

284. Defendant Daniel Biechele is without knowledge or information as to Michael Derderian's residence as set forth in Paragraph 284 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 284 of Plaintiffs' Complaint at this time.

285. Based on the criminal prosecution I currently face in the matter of State of

Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 285 of Plaintiffs' Complaint at this time.

286. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 286 of Plaintiffs' Complaint at this time.

COUNT III
MICHAEL DERDERIAN—NEGLIGENCE

287. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

288. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 288 of Plaintiffs' Complaint at this time.

COUNT IV
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

289. Defendant Daniel Biechele incorporates by reference his answers to all prior

Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

290. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 290 of Plaintiffs' Complaint at this time.

DERCO, LLC

291. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 291 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

292. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 292 of Plaintiffs' Complaint at this time.

293. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 293 of Plaintiffs' Complaint at this time.

COUNT V

DERCO, LLC—NEGLIGENCE

294. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

295. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 295 of Plaintiffs' Complaint at this time.

VIOLATION OF RHODE ISLAND GENERAL LAWS TITLE 9, CHAPTER 1, SECTION 2

296. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

297. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 297 of Plaintiffs' Complaint at this time.

HOWARD JULIAN

298. Defendant Daniel Biechele is without knowledge or information as to Howard Julian's residence and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth

Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 298 of Plaintiffs' Complaint at this time.

299. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 299 of Plaintiffs' Complaint at this time.

COUNT VI
HOWARD JULIAN—NEGLIGENCE

300. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

301. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 301 of Plaintiffs' Complaint at this time.

COUNT VII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

302. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

303. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 303 of Plaintiffs' Complaint at this time.

TRITON REALTY LIMITED PARTNERSHIP

304. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 304 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

305. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 305 of Plaintiffs' Complaint at this time.

306. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 306 of Plaintiffs' Complaint at this time.

307. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 307 of Plaintiffs' Complaint and leaves Plaintiffs

to their proof thereof.

COUNT VIII
TRITON REALTY LIMITED PARTNERSHIP—NEGLIGENCE

308. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

309. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 309 of Plaintiffs' Complaint at this time.

COUNT IX
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

310. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

311. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 311 of Plaintiffs' Complaint at this time.

TRITON REALTY, INC.

312. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 312 of Plaintiffs' Complaint and leaves Plaintiffs

to their proof thereof.

313. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 313 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

314. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 314 of Plaintiffs' Complaint at this time.

315. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 315 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

COUNT X
TRITON REALTY, INC.—NEGLIGENCE

316. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

317. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 317 of Plaintiffs' Complaint at this time.

COUNT XI
VIOLATION OF RHODE ISLAND GENERAL LAWS

TITLE 9, CHAPTER 1, SECTION 2

318. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

319. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 319 of Plaintiffs' Complaint at this time.

RAYMOND J. VILLANOVA

320. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 320 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

321. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 321 of Plaintiffs' Complaint at this time.

322. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations

contained in Paragraph 322 of Plaintiffs' Complaint at this time.

323. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 323 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

COUNT XII
RAYMOND J. VILLANOVA—NEGLIGENCE

324. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

325. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 325 of Plaintiffs' Complaint at this time.

COUNT XIII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

326. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

327. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 327 of Plaintiffs' Complaint at this time.

JACK RUSSELL

328. Defendant Daniel Biechele admits that Jack Russell was a resident of California and lead singer of the band. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 328 of Plaintiffs' Complaint at this time.

329. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 329 of Plaintiffs' Complaint at this time.

330. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 330 of Plaintiffs' Complaint at this time.

331. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State

Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 331 of Plaintiffs' Complaint at this time.

COUNT XIV
JACK RUSSELL—NEGLIGENCE

332. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

333. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 333 of Plaintiffs' Complaint at this time.

COUNT XV
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

334. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 334 of Plaintiffs' Complaint at this time.

JACK RUSSELL TOURING, INC.

335. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and

Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 335 of Plaintiffs' Complaint at this time.

336. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 336 of Plaintiffs' Complaint at this time.

337. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 337 of Plaintiffs' Complaint at this time.

338. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 338 of Plaintiffs' Complaint at this time.

339. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and

Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 339 of Plaintiffs' Complaint at this time.

COUNT XVI
JACK RUSSELL TOURING, INC.—NEGLIGENCE

340. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

341. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 341 of Plaintiffs' Complaint at this time.

COUNT XVII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

342. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

343. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 343 of Plaintiffs' Complaint at this time.

PAUL WOOLNOUGH

344. Defendant Daniel Biechele is without knowledge or information as to Paul Woolnough being a resident of the State of California and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 344 of Plaintiffs' Complaint at this time.

345. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 345 of Plaintiffs' Complaint at this time.

346. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 346 of Plaintiffs' Complaint at this time.

347. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State

Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 347 of Plaintiffs' Complaint at this time.

COUNT XVIII
PAUL WOOLNOUGH—NEGLIGENCE

348. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

349. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 349 of Plaintiffs' Complaint at this time.

COUNT XIX
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

350. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

351. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 351 of Plaintiffs' Complaint at this time.

MANIC MUSIC MANAGEMENT, INC.

352. Defendant Daniel Biechele is without knowledge or information as to Manic Music

Management, Inc.'s corporate structure or state of incorporation and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 352 of Plaintiffs' Complaint at this time.

353. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 353 of Plaintiffs' Complaint at this time.

354. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 354 of Plaintiffs' Complaint at this time.

355. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations

contained in Paragraph 355 of Plaintiffs' Complaint at this time.

COUNT XX
MANIC MUSIC MANAGEMENT, INC.—NEGLIGENCE

356. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

357. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 357 of Plaintiffs' Complaint at this time.

COUNT XXI
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

358. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

359. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 359 of Plaintiffs' Complaint at this time.

KNIGHT RECORDS, INC.

360. Defendant Daniel Biechele is without knowledge or information as to the truth or falsity of Knight Records, Inc.'s state of incorporation and leaves Plaintiffs to their proof thereof.

Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 360 of Plaintiffs' Complaint at this time.

361. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 361 of Plaintiffs' Complaint at this time.

362. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 362 of Plaintiffs' Complaint at this time.

363. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 363 of Plaintiffs' Complaint at this time.

COUNT XXII
KNIGHT RECORDS, INC.—NEGLIGENCE

364. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

365. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 365 of Plaintiffs' Complaint at this time.

COUNT XXIII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

366. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

367. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 367 of Plaintiffs' Complaint at this time.

DANIEL BIECHELE

368. Defendant Daniel Biechele denies he is a resident of the State of California. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against

self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 368 of Plaintiffs' Complaint at this time.

369. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 369 of Plaintiffs' Complaint at this time.

370. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 370 of Plaintiffs' Complaint at this time.

371. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 371 of Plaintiffs' Complaint at this time.

COUNT XXIV
DANIEL BIECHELE—NEGLIGENCE

372. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

373. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 373 of Plaintiffs' Complaint at this time.

COUNT XXV
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

374. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

375. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 375 of Plaintiffs' Complaint at this time.

ANHEUSER-BUSCH, INCORPORATED AND
ANHEUSER-BUSCH COMPANIES, INCORPORATED

376. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 376 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

377. Based on the criminal prosecution I currently face in the matter of State of

Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 377 of Plaintiffs' Complaint at this time.

378. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 378 of Plaintiffs' Complaint at this time.

379. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 379 of Plaintiffs' Complaint at this time.

380. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 380 of Plaintiffs' Complaint at this time.

381. Based on the criminal prosecution I currently face in the matter of State of

Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 381 of Plaintiffs' Complaint at this time.

382. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 382 of Plaintiffs' Complaint at this time.

383. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 383 of Plaintiffs' Complaint at this time.

384. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 384 of Plaintiffs' Complaint at this time.

ANHEUSER BUSCH—NEGLIGENCE

385. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

386. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 386 of Plaintiffs' Complaint at this time.

MCLAUGHLIN & MORAN

387. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 387 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

388. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 388 of Plaintiffs' Complaint at this time.

389. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations

contained in Paragraph 389 of Plaintiffs' Complaint at this time.

390. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 390 of Plaintiffs' Complaint at this time.

391. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 391 of Plaintiffs' Complaint at this time.

392. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 392 of Plaintiffs' Complaint at this time.

MCLAUGHLIN & MORAN—NEGLIGENCE

393. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

394. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my

privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 394 of Plaintiffs' Complaint at this time.

WHJY, INC.

395. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 395 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

396. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 396 of Plaintiffs' Complaint at this time.

397. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 397 of Plaintiffs' Complaint at this time.

398. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State

Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 398 of Plaintiffs' Complaint at this time.

399. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 399 of Plaintiffs' Complaint at this time.

400. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 400 of Plaintiffs' Complaint at this time.

401. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 401 of Plaintiffs' Complaint at this time.

WHJY, INC.—NEGLIGENCE

402. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

403. Based on the criminal prosecution I currently face in the matter of State of

Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 403 of Plaintiffs' Complaint at this time.

CLEAR CHANNEL BROADCASTING, INC.

404. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 404 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

405. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 405 of Plaintiffs' Complaint at this time.

406. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 406 of Plaintiffs' Complaint at this time.

407. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and

Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 407 of Plaintiffs' Complaint at this time.

COUNT XXVI
CLEAR CHANNEL BROADCASTING, INC.—NEGLIGENCE

408. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

409. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 409 of Plaintiffs' Complaint at this time.

DENIS P. LAROCQUE, ANTHONY BETTENCOURT AND DIANE DERUOSI, IN HER CAPACITY AS TREASURER OF THE TOWN OF WEST WARWICK

410. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 410 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

411. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 411 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

412. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 412 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

413. Defendant Daniel Biechele is without knowledge or information of the truth or

falsity of the allegations set forth in Paragraph 413 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

414. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 414 of Plaintiffs' Complaint at this time.

415. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 415 of Plaintiffs' Complaint at this time.

416. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 416 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

417. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 417 of Plaintiffs' Complaint at this time.

418. Based on the criminal prosecution I currently face in the matter of State of

Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 418 of Plaintiffs' Complaint at this time.

419. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 419 of Plaintiffs' Complaint at this time.

420. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 420 of Plaintiffs' Complaint at this time.

421. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 421 of Plaintiffs' Complaint at this time.

422. Based on the criminal prosecution I currently face in the matter of State of

Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 422 of Plaintiffs' Complaint at this time.

423. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 423 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

424. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 424 of Plaintiffs' Complaint at this time.

COUNT XXVII
DIANE DERUOSI, IN HER CAPACITY AS TREASURER OF THE TOWN OF WEST WARWICK—NEGLIGENCE

425. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

426. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 426 of Plaintiffs' Complaint at this time.

COUNT XXVIII
DENIS P. LAROCQUE, FIRE INSPECTOR—NEGLIGENCE

427. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

428. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 428 of Plaintiffs' Complaint at this time.

COUNT XXIX
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

429. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

430. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 430 of Plaintiffs' Complaint at this time.

COUNT XXX
ANTHONY BETTENCOURT—NEGLIGENCE

431. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

432. Based on the criminal prosecution I currently face in the matter of State of

Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 432 of Plaintiffs' Complaint at this time.

STATE OF RHODE ISLAND AND
IRVING J. OWENS, FIRE MARSHAL

433. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 433 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

434. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 434 of Plaintiffs' Complaint at this time.

435. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 435 of Plaintiffs' Complaint at this time.

COUNT XXXI
STATE OF RHODE ISLAND—NEGLIGENCE

436. Defendant Daniel Biechele incorporates by reference his answers to all prior

Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

437. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 437 of Plaintiffs' Complaint at this time.

COUNT XXXII
IRVING J. OWENS—NEGLIGENCE

438. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

439. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 439 of Plaintiffs' Complaint at this time.

BRIAN BUTLER

440. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 440 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

441. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and

Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 441 of Plaintiffs' Complaint at this time.

442. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 442 of Plaintiffs' Complaint at this time.

443. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 443 of Plaintiffs' Complaint at this time.

COUNT XXXIII
BRIAN BUTLER—NEGLIGENCE

444. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

445. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations

contained in Paragraph 445 of Plaintiffs' Complaint at this time.

LIN TELEVISION CORPORATION

446. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 446 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

447. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 448 of Plaintiffs' Complaint at this time.

448. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 448 of Plaintiffs' Complaint at this time.

449. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 449 of Plaintiffs' Complaint at this time.

COUNT XXXIV

LIN TELEVISION CORPORATION—NEGLIGENCE

450. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

451. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 451 of Plaintiffs' Complaint at this time.

CBS BROADCASTING, INC. d/b/a WPRI – CHANNEL 12

452. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 452 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

453. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 453 of Plaintiffs' Complaint at this time.

454. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations

contained in Paragraph 454 of Plaintiffs' Complaint at this time.

455. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 455 of Plaintiffs' Complaint at this time.

COUNT XXXV
CBS BROADCASTING, INC.—NEGLIGENCE

456. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

457. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 457 of Plaintiffs' Complaint at this time.

BARRY H. WARNER

458. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 458 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

459. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 459 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

460. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 460 of Plaintiffs' Complaint at this time.

461. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 461 of Plaintiffs' Complaint at this time.

462. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 462 of Plaintiffs' Complaint at this time.

463. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 463 of Plaintiffs' Complaint at this time.

COUNT XXXVI
BARRY H. WARNER—NEGLIGENCE

464. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

465. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 465 of Plaintiffs' Complaint at this time.

COUNT XXXVII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

466. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

467. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 467 of Plaintiffs' Complaint at this time.

LUNA TECH, INC.—NEGLIGENCE

468. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 468 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

469. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 469 of Plaintiffs' Complaint at this time.

470. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 470 of Plaintiffs' Complaint at this time.

471. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 471 of Plaintiffs' Complaint at this time.

COUNT XXXVIII
LUNA TECH, INC.—STRICT LIABILITY

472. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

473. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my

privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 473 of Plaintiffs' Complaint at this time.

474. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 474 of Plaintiffs' Complaint at this time.

475. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 475 of Plaintiffs' Complaint at this time.

476. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 476 of Plaintiffs' Complaint at this time.

COUNT XXXIX
HIGH TECH SPECIAL EFFECTS, INC.—NEGLIGENCE

477. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 477 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

478. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 478 of Plaintiffs' Complaint at this time.

479. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 479 of Plaintiffs' Complaint at this time.

480. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 480 of Plaintiffs' Complaint at this time.

COUNT XL
HIGH TECH SPECIAL EFFECTS, INC.—STRICT LIABILITY

481. Defendant Daniel Biechele incorporates by reference his answers to all prior

Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

482. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 482 of Plaintiffs' Complaint at this time.

483. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 483 of Plaintiffs' Complaint at this time.

484. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 484 of Plaintiffs' Complaint at this time.

485. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations

contained in Paragraph 485 of Plaintiffs' Complaint at this time.

COUNT XLI
AMERICAN FOAM CORPORATION—NEGLIGENCE

486. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

487. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 487 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

488. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 488 of Plaintiffs' Complaint at this time.

489. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 489 of Plaintiffs' Complaint at this time.

490. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State

Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 490 of Plaintiffs' Complaint at this time.

491. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 491 of Plaintiffs' Complaint at this time.

COUNT XLII
AMERICAN FOAM CORPORATION—STRICT LIABILITY

492. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

493. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 493 of Plaintiffs' Complaint at this time.

494. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 494 of Plaintiffs' Complaint at this time.

495. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 495 of Plaintiffs' Complaint at this time.

496. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 496 of Plaintiffs' Complaint at this time.

COUNT XLIII
LEGGETT & PLATT INCORPORATED—NEGLIGENCE

497. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

498. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 498 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

499. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations

contained in Paragraph 499 of Plaintiffs' Complaint at this time.

500. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 500 of Plaintiffs' Complaint at this time.

501. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 501 of Plaintiffs' Complaint at this time.

COUNT XLIV
LEGGETT & PLATT CORPORATION—STRICT LIABILITY

502. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

503. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 503 of Plaintiffs' Complaint at this time.

504. Based on the criminal prosecution I currently face in the matter of State of

Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 504 of Plaintiffs' Complaint at this time.

505. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 505 of Plaintiffs' Complaint at this time.

506. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 506 of Plaintiffs' Complaint at this time.

COUNT XLIII
LEGGETT & PLATT INCORPORATED—NEGLIGENCE

507. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

508. Defendant Daniel Biechele is without knowledge or information as to L & P Financial Services Co.'s state of incorporation and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel

Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 508 of Plaintiffs' Complaint at this time.

509. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 509 of Plaintiffs' Complaint at this time.

510. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 510 of Plaintiffs' Complaint at this time.

COUNT XLVI
L & P FINANCIAL SERVICES CO.—STRICT LIABILITY

511. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

512. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and

Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 512 of Plaintiffs' Complaint at this time.

513. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 513 of Plaintiffs' Complaint at this time.

514. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 514 of Plaintiffs' Complaint at this time.

515. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 515 of Plaintiffs' Complaint at this time.

COUNT XLVII
GENERAL FOAM CORPORATION—NEGLIGENCE

516. Defendant Daniel Biechele incorporates by reference his answers to all prior

Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

517. Defendant Daniel Biechele is without knowledge or information as to General Foam Corporation's state of incorporation and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 517 of Plaintiffs' Complaint at this time.

518. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 518 of Plaintiffs' Complaint at this time.

519. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 519 of Plaintiffs' Complaint at this time.

COUNT XLVIII
GENERAL FOAM CORPORATION—STRICT LIABILITY

520. Defendant Daniel Biechele incorporates by reference his answers to all prior

Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

521. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 521 of Plaintiffs' Complaint at this time.

522. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 522 of Plaintiffs' Complaint at this time.

523. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 523 of Plaintiffs' Complaint at this time.

524. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations

contained in Paragraph 524 of Plaintiffs' Complaint at this time.

COUNT XLIX
GFC FOAM, LLC—NEGLIGENCE

525. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

526. Defendant Daniel Biechele is without knowledge or information as to GFC Foam, LLC's state of incorporation and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the remaining allegations contained in Paragraph 526 of Plaintiffs' Complaint at this time.

527. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 527 of Plaintiffs' Complaint at this time.

528. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations

contained in Paragraph 528 of Plaintiffs' Complaint at this time.

529. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 529 of Plaintiffs' Complaint at this time.

COUNT L
GFC FOAM, LLC—STRICT LIABILITY

530. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

531. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 531 of Plaintiffs' Complaint at this time.

532. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 532 of Plaintiffs' Complaint at this time.

533. Based on the criminal prosecution I currently face in the matter of State of

Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 533 of Plaintiffs' Complaint at this time.

534. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 534 of Plaintiffs' Complaint at this time.

COUNT LI
FOAMEX LP—SUCESSOR LIABILITY FOR GENERAL FOAM CORPORATION

535. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

536. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 536 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

COUNT LII
FOAMEX INTERNATIONAL, INC.—NEGLIGENCE

537. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

538. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 538 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

539. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 539 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

540. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 540 of Plaintiffs' Complaint at this time.

541. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 541 of Plaintiffs' Complaint at this time.

COUNT LIII
FOAMEX INTERNATIONAL, INC.—STRICT LIABILITY

542. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

543. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations

contained in Paragraph 543 of Plaintiffs' Complaint at this time.

544. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 544 of Plaintiffs' Complaint at this time.

545. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 545 of Plaintiffs' Complaint at this time.

546. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 546 of Plaintiffs' Complaint at this time.

COUNT LIV
FMXI, INC.—LIABILITY AS GENERAL PARTNER

547. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

548. Defendant Daniel Biechele is without knowledge or information of the truth or

falsity of the allegations set forth in Paragraph 548 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

549. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 549 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

COUNT LV
PMC, INC.—NEGLIGENCE

550. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

551. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 551 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

552. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 552 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

COUNT LVI
PMC GLOBAL, INC.—NEGLIGENCE

553. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

554. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 554 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

555. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 555 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

JBL INCORPORATED f/k/a James B. Lansing Sound, Incorporated d/b/a JBL Professional—NEGLIGENCE

556. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 556 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

557. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 557 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

558. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 558 of Plaintiffs' Complaint at this time.

559. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 559 of Plaintiffs' Complaint at this time.

560. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State

Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 560 of Plaintiffs' Complaint at this time.

561. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 561 of Plaintiffs' Complaint at this time.

562. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 562 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

563. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 563 of Plaintiffs' Complaint at this time.

564. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 564 of Plaintiffs' Complaint at this time.

COUNT LVII

JBL INCORPORATED—STRICT LIABILITY

565. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

566. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 566 of Plaintiffs' Complaint at this time.

567. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 567 of Plaintiffs' Complaint at this time.

568. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 568 of Plaintiffs' Complaint at this time.

569. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and

Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 569 of Plaintiffs' Complaint at this time.

ESSEX INSURANCE COMPANY, MULTI-STATE INSPECTIONS, INC. AND HIGH CALIBER INSPECTIONS, INC.

570. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

571. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 571 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

572. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 572 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

573. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 573 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

574. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 574 of Plaintiffs' Complaint at this time.

575. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my

privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 575 of Plaintiffs' Complaint at this time.

ESSEX INSURANCE COMPANY—NEGLIGENCE

576. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

577. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 577 of Plaintiffs' Complaint at this time.

COUNT LVIII
MULTI-STATE INSPECTIONS, INC.—NEGLIGENCE

578. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

579. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 579 of Plaintiffs' Complaint at this time.

COUNT LIX
HIGH CALIBER INSPECTIONS, INC.—NEGLIGENCE

580. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

581. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 581 of Plaintiffs' Complaint at this time.

UNDERWRITERS AT LLOYD'S,
LONDON AND GRESHAM & ASSOCIATES OF R.I., INC.

582. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 582 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

583. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 583 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

584. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 584 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

585. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 585 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

586. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my

privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 586 of Plaintiffs' Complaint at this time.

587. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 587 of Plaintiffs' Complaint at this time.

UNDERWRITERS AT LLOYD'S, LONDON—NEGLIGENCE

588. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

589. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 589 of Plaintiffs' Complaint at this time.

COUNT LX
GRESHAM & ASSOCIATES OF R.I., INC.—NEGLIGENCE

590. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

591. Based on the criminal prosecution I currently face in the matter of State of

Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 591 of Plaintiffs' Complaint at this time.

FOUR SEASONS COACH LEASING, INC.

592. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 592 of Plaintiffs' Complaint at this time.

593. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 593 of Plaintiffs' Complaint at this time.

594. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 594 of Plaintiffs' Complaint at this time.

595. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 595 of Plaintiffs' Complaint at this time.

COUNT LXI
FOUR SEASONS COACH LEASING, INC.—NEGLIGENCE

596. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

597. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 597 of Plaintiffs' Complaint at this time.

COUNT LXII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

598. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

599. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State

Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 599 of Plaintiffs' Complaint at this time.

COUNT LXIII
"JOHN DOE" DEFENDANTS—NEGLIGENCE

600. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

601. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 601 of Plaintiffs' Complaint at this time.

602. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 602 of Plaintiffs' Complaint at this time.

603. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 603 of Plaintiffs' Complaint at this time.

604. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 604 of Plaintiffs' Complaint at this time.

605. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 605 of Plaintiffs' Complaint at this time.

COUNT LXIV
"JOHN DOE" DEFENDANTS—STRICT LIABILITY

606. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' Complaint as if more fully set forth herein.

607. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 607 of Plaintiffs' Complaint at this time.

608. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my

privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 608 of Plaintiffs' Complaint at this time.

609. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 609 of Plaintiffs' Complaint at this time.

610. Based on the criminal prosecution I currently face in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, I have no choice but to invoke my privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, I respectfully decline to answer the allegations contained in Paragraph 610 of Plaintiffs' Complaint at this time.

WHEREFORE, Defendant Daniel Biechele demands entry of Judgment in his behalf as to Plaintiffs' Complaint.

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I hereby certify that I placed with a delivery service to be hand delivered a true copy of the within to the above local counsel of record and instructed to send by certified mail, return receipt to out of state counsel of record on the 27 day of August, 2004.

Donald J. Maroney