

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SJUNDE AP-FONDEN and THE CLEVELAND  
BAKERS AND TEAMSTERS PENSION FUND,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

GENERAL ELECTRIC COMPANY and  
JEFFREY S. BORNSTEIN,

Defendants.

17 Civ. 08457 (JMF) (GWG)

**DEFENDANT GENERAL ELECTRIC COMPANY'S SECOND SUPPLEMENTAL  
RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF  
INTERROGATORIES**

Pursuant to Rules 26 and 33 of the FRCP and the Local Rules, Defendant GE, by and through its attorneys, hereby provides the following second supplemental responses and objections (the “Second Supplemental Responses”) to Plaintiffs’ First Set of Interrogatories to Defendant General Electric Company, served on GE by the Plaintiffs on March 3, 2021 in the Action. These Second Supplemental Responses supplement and should be read together with GE’s responses and objections to Plaintiffs’ First Set of Interrogatories that GE served on Plaintiffs on April 2, 2021 (the “Initial Responses”), and the supplemental responses and objections to Plaintiffs’ First Set of Interrogatories served on Plaintiffs on May 17, 2021 (the “First Supplemental Responses”).<sup>1</sup>

The Second Supplemental Responses reflect the current state of GE’s knowledge or information regarding the Interrogatories. GE reserves the right to further supplement or otherwise

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<sup>1</sup> Where not otherwise defined, capitalized terms shall have the meaning given to them in GE’s Initial Responses and First Supplemental Responses.

amend its responses to Plaintiffs' First Set of Interrogatories based on additional information obtained through its investigation or discovery in this Action or for any other reason.

**SUPPLEMENTAL GENERAL RESPONSES AND OBJECTIONS**

GE refers to and incorporates by reference its General Responses and Objections set forth in the Initial Responses.

**SUPPLEMENTAL OBJECTIONS TO DEFINITIONS**

GE refers to and incorporates by reference its Objections to Definitions set forth in the Initial Responses.

**SUPPLEMENTAL OBJECTIONS TO INSTRUCTIONS**

GE refers to and incorporates by reference its Objections to Instructions set forth in the Initial Responses.

**SUPPLEMENTAL SPECIFIC RESPONSES AND OBJECTIONS**

**INTERROGATORY NO. 1:**

Identify each person who testified under oath or provided an interview in connection with the SEC's proceeding *In the Matter of General Electric Company*, Administrative Proceeding File No. 3-20165, which resulted in the SEC's Order Instituting Cease-and-Desist Proceedings dated December 9, 2020.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:**

GE incorporates by reference the General Objections, Objections to Definitions, Objections to Instructions, and its Specific Objections to this Interrogatory in the Initial Responses.

Below, GE further supplements its list of individuals identified in response to Interrogatory No. 1 in its Initial Responses and First Supplemental Responses. GE notes that it is

providing this information to the best of its knowledge, and makes no representation as to the accuracy of information that is outside of GE's first-hand knowledge:

<b>INDIVIDUAL</b>	<b>LAST KNOWN PLACE OF EMPLOYMENT</b>	<b>FORMAT</b>
Steve Bolze	Blackstone Group	Transcribed Testimony
Jeff Bornstein	Generation Capital Partners	Forthcoming (Transcribed Testimony)
Lynn Calpeter	GE	Informal Interview
Ron Coty	GE	Informal Interview
Matthew Cribbins	Generation Capital	Transcribed Testimony
Shay Davis	GE	Informal Interview
Grant Dawson	Eldridge Industries	Transcribed Testimony
Robert DeGennaro	GE	Forthcoming (TBD)
Estela Delgadillo	Artera Services	Informal Interview
Hong Dinh	Altium Packaging	Informal Interview
Timothy Donovan	Carestream Dental	Transcribed Testimony
Jennifer Erickson	Mastercard	Forthcoming (TBD)
Michael Eshoo	GE	Transcribed Testimony
John Flannery	Charlesbank Capital Partners LLC	Informal Interview
Robert Giglietti	GE	Forthcoming (TBD)
Chris Gill	GE	Transcribed Testimony
Eric Gray	GE	Transcribed Testimony
Robert Green	Cambrex	Transcribed Testimony
Jan Hauser	Vonage	Transcribed Testimony

<b>INDIVIDUAL</b>	<b>LAST KNOWN PLACE OF EMPLOYMENT</b>	<b>FORMAT</b>
James Idleburg	GE	Informal Interview
Jeff Immelt	New Enterprise Associates	Forthcoming (Transcribed Testimony)
Scott Inglis	GE	Informal Interview
Columbus Johnson	Pacific Western Bank	Informal Interview
Puneet Mahajan	Suffolk Construction	Transcribed Testimony
Marc Mascola	Eldridge Industries	Transcribed Testimony
Paul McClanahan	Cantor Fitzgerald	Informal Interview
Paul McElhinney	AE Industrial Partners, LP	Transcribed Testimony
Kelly McGinnis	Thermo Fisher Scientific	Informal Interview
Kenny Merritt	Wabtec Corporation	Informal Interview
Jamie Miller	Qualcomm	Informal Interview
Brian Millhaem	GE	Informal Interview
Jamey Mock	Perkin Elmer	Informal Interview
Joanna Morris	GE	Transcribed Testimony
Teo Osben	Johnson Controls	Informal Interview
Michael Paoli	GE	Informal Interview
Mamta Patel	Delos	Informal Interview
Matthew Potvin	GE	Transcribed Testimony
Brandon Querbes	GE	Informal Interview
Joseph Ryser	FirstKey Homes	Informal Interview
Daniel Smith	GE	Informal Interview
Aidan Viggiano	Twilio	Forthcoming (TBD)

INDIVIDUAL	LAST KNOWN PLACE OF EMPLOYMENT	FORMAT
Michael Vitanza	GE	Transcribed Testimony
Kevin Weber	Synchrony Ventures	Informal Interview
Brian Weverman	Global Infrastructure Partners	Transcribed Testimony
Nathan Wilson	GE	Informal Interview

Dated: New York, New York  
September 24, 2021

Respectfully submitted,

LATHAM & WATKINS LLP

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*Attorneys for Defendants General Electric  
Company and Jeffrey S. Bornstein*

**VERIFICATION**

I, Michael Montemarano, Senior Audit Manager – Corporate Audit Staff at the General Electric Company, do hereby certify under oath that I have read the foregoing responses to Plaintiffs' First Set of Interrogatories, and that they are true and accurate to the best of my knowledge, based on the information available to me at this time.

I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on the 24 day of September, 2021.



A handwritten signature in black ink, appearing to read 'M. Montemarano', is written over a solid horizontal line.