

- (b) The substance of the facts and opinions to which the expert is expected to testify; and
- (c) A summary of the grounds for each opinion.

RESPONSE:

Expert witnesses have not been selected, and the Fund will supplement this response when the requested information becomes available.

Interrogatory No. 45:

Identify by name, address, and telephone number, every factual witness that Manville may call to testify in the trial of this case.

RESPONSE:

The Fund has no information regarding factual witnesses at this time. The Fund will supplement this response when the information requested becomes available.

Interrogatory No. 46:

Identify every document that Manville may offer into evidence in the trial of this case.

RESPONSE:

See response to Interrogatory No. 45.

Respectfully Submitted,


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