

INTERROGATORY NO. 10:

- (a) Identify each and every lay witness who will testify at trial and the subjects as to which each such lay witness will testify;
- (b) Pursuant to Rule 26, identify each and every independent expert witness, who will testify at trial and the subjects on which each such witness will testify and the opinions you expect to elicit from each such witness;
- (c) Pursuant to Rule 26, for each and every controlled expert who will testify at trial, and for each such witness:
 - (i) state the subject matter on which the expert is expected to testify;
 - (ii) state the conclusions and opinions of the witness and the bases therefore, including, but not limited to, identifying each and every treatise, article or text upon which such expert will rely in testifying;
 - (iii) state the qualifications of such witness;
 - (iv) identify any and all reports prepared by the witness, including drafts thereof, referring to and/or relating to this case.

ANSWER:

Unknown at this time. However, answering defendant reserves the right to supplement this response.

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