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3 5.33 List any person with knowledge of facts material to
4 this case, including any persons you presently consider may be
5 called as witnesses at trial, including their names, addresses,
6 occupations, and telephone numbers.

7 ANSWER: Exhibits and witnesses intended to be used at trial will be produced
8 when developed consistent with pretrial orders of the court. These are not
9 currently available.
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12 5.34 List the names, addresses, occupations, professional
13 qualifications, and telephone numbers of all expert witnesses whom
14 you will call at trial of this case, and as to each further state:

- 15 (a) The subject matter upon which each such witness
16 is expected to testify;
17 (b) The substance of the facts and opinions to which
18 the expert is expected to testify;
19 (c) A summary of the grounds for each such opinion.
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