INTERROGATORY NO. 123:

If your Answer to Interrogatory No. 122 is "yes," then with respect to each such inspection, test or survey [between 1930 and 1980]:

(a) Identify the governmental entity conducting the same;

(b) State the date(s) on which the same was conducted;

(c) Describe the nature of the inspection, test or survey including, but not limited to, the results or conclusions thereof; and,

(d) Identify any and all documents referring to, relating to or reflecting the same.

ANSWER:

See Answer to Interrogatory No. 122, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 124:

Identify:

(a) Any expert whom you intend to call as a witness;

(b) The subject matter on which the expert is expected to testify;

(c) The substance of the facts and opinions to which the expert is expected to testify;

(d) A summary of the grounds for each opinion;

(e) The address of such person and field of expertise;

(f) Identify and produce each treatise, article or text upon which the expert will rely in testifying.

ANSWER: