ANSWER: Yes, if any.

5.06 If your answer to the preceding interrogatory is in the affirmative:

(a) Specifically indicate the nature of the conduct;

(b) Identify each document which in any way bears upon this issue;

(c) Identify any eye-witness or other person who has information of any kind concerning such contention.

ANSWER: See 5.01 and 5.02 above.