

1 offers, notations of any sort of conversations, telephone calls,
2 meetings or other communications, bulletins, magazines,
3 publications, printed matter, photographs, microfilms, indexes,
4 computer printouts, teletypes, telefax, invoices, worksheets and
5 all drafts, alterations, modifications, changes and amendments of
6 any of the foregoing, tapes, tape recording transcripts, graphic or
7 aural records or representations of any kind, and electronic,
8 mechanical or electric records of representations of any kind, of
9 which you have knowledge or which are now, or were formerly in your
10 actual or constructive possession, custody or control, or which
11 come into your control during the course of this litigation.

12 4. "Possession, custody or control" includes the joint
13 or several possession, custody or control not only by the person to
14 whom these interrogatories and requests are addressed, but also the
15 joint or several possession, custody or control by each other
16 person acting or purporting to act on behalf of the person, whether
17 as employee, attorney, accountant, agent, sponsor, spokesman or
18 otherwise.

19 5. "Relates to" means supports, evidences, describes,
20 mentions, refers to, contradicts or comprises.

21 6. "Person" means any natural person, firm, corporation,
22 partnership, proprietorship, joint venture, organization, group of
23 natural persons or other association separately identifiable,
24 whether or not such association has a separate juristic existence
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