

1 (c) Specifically identify any eye-witness who has
2 information of any kind concerning such a
contention.

3 ANSWER: Witnesses and exhibits intended to be used at trial will be produced
4 when developed consistent with pretrial orders of the court. These are not currently
5 available.

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10 5.31 Do you contend that the claim of the plaintiff is
11 barred by improper venue and/or lack of jurisdiction?

12 ANSWER: No.
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16 5.32 If your answer to the preceding interrogatory is in
17 the affirmative, indicate the reason(s) why you assert there is
18 improper venue and/or lack of jurisdiction.

19 ANSWER: See 5.31 above.
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