

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SAINT LOUIS UNIVERSITY,)	
a Missouri benevolent corporation,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:07CV1733 CEJ
)	
AVIS MEYER,)	
)	
Defendant.)	

**PLAINTIFF SAINT LOUIS UNIVERSITY’S LIST OF DEPOSITIONS,
INTERROGATORY ANSWERS, AND ANSWERS TO REQUESTS FOR ADMISSION
TO BE USED AT TRIAL**

COMES NOW Plaintiff Saint Louis University (“Plaintiff”), by and through its undersigned counsel and in accordance with Section II.4.(a) of this Court’s Case Management Order dated February 7, 2008 [dkt # 12], hereby submits its List of Depositions, Interrogatory Answers, and Answers to Requests for Admission that may be used as trial, as follows:

Depositions (including all exhibits and any corresponding video clips)

- Deposition of Avis Meyer, dated June 4, 2008:

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Page 22, line 17 – page 23, line 4	Page 46, line 21 – page 47, line 12
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Page 23, lines 18-20	Page 60, lines 9-25
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Page 24, line 5 – page 25, line 3	Page 65, lines 3-5
Page 25, line 15 – page 27, line 1	Page 65, lines 9-20
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Page 34, line 15 – page 35, line 7	Page 68, line 25 – page 69, line 22
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Page 125, line 25 – page 126, line 5
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Page 193, lines 7-14
Page 193, line 17 – page 195, line 18
Page 202, line 21 – page 204, line 15

- Deposition of Diana Benanti, dated June 12, 2008

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Interrogatory Answers

- Defendant's Answers to Plaintiff's First Set of Interrogatories, Nos. 6, 7, 11, 13, 14, and 15
- Defendant's Supplemental Answers to Plaintiff's First Set of Interrogatories, Nos. 2, 5, 6, 8, 11, 12, and 15
- Plaintiff's Answers and Objections to Defendant's First Set of Interrogatories, Nos. 1, 2, 3, 8, 9, and 10.

Answers to Requests for Admission

- Defendant's Response to Plaintiff's First Request for Admissions, Nos. 1, 2, 3, 4, and 5

Plaintiff further reserves the right to supplement the designations made herein in the event that it becomes aware of the need for additional testimony/discovery responses as a result of the Court's rulings on pre-trial or trial motions, or through other means. Plaintiff also reserves the right to supplement this statement in light of any witness list, exhibit list or other pretrial matter filed by Defendant. Finally, Plaintiff reserves the right to offer into evidence any deposition excerpts or written discovery answers for purposes of impeachment, cross-examination or rebuttal of witnesses called by Defendant at trial or hearing in this matter.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I further certify that on the 31st day of December, 2008, the foregoing was filed with the Clerk of Court to be served via the Court's ECF system upon all counsel of record.

/s/ Frank B. Janoski

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