

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

SAINT LOUIS UNIVERSITY,)
 a Missouri benevolent corporation,)
)
 Plaintiff,)
)
 v.)
)
 AVIS MEYER,)
)
 Defendant.)

Case No. 4:07-cv-01733-CEJ

**DEFENDANT’S DISCOVERY DESIGNATIONS
PURSUANT TO THE COURT’S ORDER (d/e 12) OF FEBRUARY 7, 2008**

Defendant, Dr. Avis Meyer (“Meyer”), pursuant to the Court’s Order (d/e 12) of February 7, 2008, submits the following deposition designations and answers to interrogatories that may be read offered into evidence at trial, as follows:

I. Deposition Designations

Deposition of Dr. Avis Meyer, June 4, 2007	
From	To
40:2	43:7
44:22	46:8
46:16-20	
48:10-21	
56:22	57:11
61:24	62:15
73:12	74:19
75:15	77:2
78:1-21	
79:5	83:21
83:24	84:22
85:25	90:6
90:13	91:19
92:5	93:22
99:22	100:4
106:8	109:4
110:3-11	

Deposition of Dr. Avis Meyer, June 4, 2007	
From	To
112:7	114:12
124:3	125:7
125:25	126:5
127:2	129:1
132:3-25	
134:11-23	
135:24	139:18
141:6	144:8
144:17	146:21
147:24	151:11
151:15	152:4
152:21	153:15
154:2-15	
165:17	171:21
172:1	175:20
186:16	187:2
197:2	199:3

Deposition of Diana Benanti, June 12, 2007	
From	To
23:5-14	
24:14-24	
25:1-7	
25:17-20	
26:2-21	
27:1	28:1-22
28:16	29:16
30:24	31:6
36:12	37:1
40:20	41:6
44:21	45:14
48:9-13	
52:21	56:10
60:3	63:9
67:4	69:23
70:10	72:2
80:17	82:6
91:1	92:20
94:20	95:5

II. Answers To Interrogatories

A. Plaintiff's Answers To Defendant's First Set Of Interrogatories

Defendant proposes to offer into evidence Plaintiff's Answer to Defendant's Interrogatory Nos. 7, 10. Plaintiff's Answers were served on Defendant on August 18, 2008. (See Exhibit 1 attached hereto).

B. Defendant's Answers To Plaintiff's First Set Of Interrogatories

Defendant proposes to offer into evidence Defendant's Answer to Plaintiff's Interrogatory Nos. 2, 3, 4, 5, 6, 7, 8, 9, 10, 16. Defendant's Answers were served on Plaintiff on March 19, 2008. (See Exhibit 2 attached hereto).

C. Defendant's Supplemental Answers To Plaintiff's First Set Of Interrogatories

Defendant proposes to offer into evidence Defendant's Supplemental Answer to Plaintiff's Interrogatory Nos. 2, 3, 4, 5, 6, 8, 9, 11, 15. Defendant's Supplemental Answers were served on Plaintiff on September 4, 2008. (See Exhibit 3 attached hereto).

Respectfully submitted,

POLSTER, LIEDER, WOODRUFF &
LUCCHESI, L.C.

By: s/Nelson D. Nolte
Nelson Nolte, #111,801
Brian J. Gill, #2,694,853
12412 Powerscourt Drive, Suite 200
St. Louis, Missouri 63131-3615
(314) 238-2400
(314) 238-2401 (fax)
E-mail: bgill@patpro.com
E-mail: nnolte@patpro.com
ATTORNEYS FOR DEFENDANT

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.

Frank B. Janoski, #3480
Bridget Hoy, #109375
Lewis, Rice & Fingersh, L.C.
500 North Broadway, Suite 2000
St. Louis, Missouri 63102
T (314) 444-7600
F (314) 241-6056
ATTORNEYS FOR PLAINTIFF

s/Nelson D. Nolte
