

are expected to testify on behalf of the Plaintiff, along with the subject matter of that testimony.

ANSWER:

2. Pursuant to Supreme Court Rule 213(f)(2), state the full name, address, telephone number, job title, occupation and place of employment of all independent expert witnesses who are expected to testify along with the subject matter of that testimony, their qualifications, and the opinions that the Plaintiff expects to elicit from each one.

ANSWER:

3. Pursuant to Supreme Court Rule 213(f)(3), state the full name, address, telephone number, job title, occupation and place of employment of all controlled expert witnesses who may be called upon to testify at trial, and for each one, state:

- a. The subject matter on which the witness will testify;
- b. The conclusions and opinions of the witness and the bases therefore;
- c. The qualifications of the witness; and
- d. Any reports prepared by the witness about the case.

ANSWER: