

CITY OF BATON ROUGE/
PARISH OF EAST BATON ROUGE

NUMBER 610359 SEC. "D"
19TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

STEPHEN C. MYERS

STATE OF LOUISIANA

**STEPHEN C. MYERS'S FIRST SET OF SUPPLEMENTAL ANSWERS TO
PLAINTIFFS' INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS**

NOW INTO COURT, through undersigned counsel, comes defendant/plaintiff-in-reconvention, STEPHEN C. MYERS ("*MYERS*"), who supplements his responses to the Interrogatories and Requests for Production of Documents propounded by the plaintiff, the CITY OF BATON ROUGE / PARISH OF EAST BATON ROUGE ("*the CITY-PARISH*"), as follows:

Interrogatory No. 9

Please provide the names, addresses and telephone numbers of each and every witness you intend to call at the hearing in this matter.

Answer to Interrogatory No. 9

- 4) Dana Berkowitz, Ph. D; Department of Sociology, 133 Stubbs Hall, Louisiana State University, Baton Rouge, Louisiana 70803; (225) 578-5348; Dr. Berkowitz will be called by MYERS as an expert witness who will testify as to how the definition of family has changed since 1954 and as to how the existing definition of family does not capture the lived realities of a large proportion of households, both nationally and specifically in East Baton Rouge.

RESPECTFULLY SUBMITTED,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served on the CITY OF BATON ROUGE / PARISH OF EAST BATON ROUGE and the OFFICE OF THE ATTORNEY GENERAL, STATE OF LOUISIANA, through their counsel of record listed below, by hand delivery, e-mail, facsimile transmission, and/or by depositing same in the United States Mail, properly addressed and postage prepaid, this 18th day of January, 2013:

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