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# State of Florida Division of Administrative Hearings: Petitioner's First Interrogatories to St. Johns River Water Management District

Michael W. Woodward

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STATE OF FLORIDA  
DIVISION OF ADMINISTRATIVE HEARINGS

MICHAEL W. WOODWARD,

Petitioner,

v.

DOAH CASE NO. 90-003234

UNIVERSITY OF NORTH FLORIDA  
and ST. JOHNS RIVER WATER  
MANAGEMENT DISTRICT,

SJRWMD FILE OF RECORD  
NO. 90-916C

Respondents.  
\_\_\_\_\_ /

PETITIONER'S FIRST INTERROGATORIES  
TO ST. JOHNS RIVER WATER MANAGEMENT DISTRICT

Petitioner request that Respondent, ST. JOHNS RIVER WATER MANAGEMENT DISTRICT, answer the following interrogatories and produce the requested documents in accord with Florida Rules of Civil Procedure 1.340 and 1.350.

1. What is your name, address, and if you are answering for someone else, your official position?

2. Please state the name and address of all expert witnesses you expect to call to testify as an expert witness at trial.

3. Please state the field of expertise of any and all expert witnesses and set forth the professional degree, special professional training and experience special knowledge or skill of said expert witness.

4. Please state the subject matter on which each expert witness is expected to testify.

5. Please state the substance of the facts and opinion to which the expert witness is to testify on.

6. Please state the summary of the grounds for each opinion the expert witness is to testify on.

7. Please state whether any of the above-described expert witnesses have ever testified on behalf of the attorneys representing you and if so, please state the amount of times, the dates and the cases that said testimony was in.

8. Please state the names and addresses of any and all expert witnesses who have been retained or specially employed by you or your attorneys in anticipation of litigation or preparation for trial and who are not expected to be called as witnesses at trial.

9. Please list all documents or demonstrative exhibits you intend to introduce at any administrative proceeding. Please produce or provide for the inspection of originals.

10. Is the subject road a part, a phase, or in any way related to another or larger project. If yes, please give details of the related road including dates, projections, size and purposes.

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STATE OF FLORIDA  
COUNTY OF \_\_\_\_\_

I HEREBY CERTIFY that on this day personally appeared before me, an officer duly authorized to administer oaths and take acknowledgments, \_\_\_\_\_, to me well known and known to me to be the person described in the who answered the foregoing interrogatories; and \_\_\_\_\_ acknowledged before me that \_\_\_\_\_ executed the same for the purposes therein express.

WITNESS my hand and official seal at \_\_\_\_\_,  
County of \_\_\_\_\_, and State of Florida, this \_\_\_\_\_ day of \_\_\_\_\_, 1990.

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Notary public  
My commission expires: