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all for this assertion, let alone any detailed explanation for refusing to answer. The responses to the rest of the above-numbered Requests are similarly deficient.



(4) Rule that Complaint Counsel may not be heard to object to introduction and use of secondary evidence to show what the withheld admission, testimony, documents, or other evidence would have shown.

TL: -4.114.1. CI. ... 2011

CERTIFICATE OF SERVICE

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2. Complaint Counsel's response shall be amended to fully comply with
Interrogatory No. 9, and Complaint Counsel shall provide Respondent with the names of