

**IN THE STATE OF MISSOURI
JACKSON COUNTY DISTRICT COURT
AT INDEPENDENCE,
MISSOURI**

SAMUEL K. LIPARI)	
(Assignee of Dissolved)	
Medical Supply Chain, Inc.))	
<i>Plaintiff</i>)	
)	
vs.)	
)	
GENERAL ELECTRIC COMPANY,)	Case No. 0616-cv07421
GENERAL ELECTRIC CAPITAL)	
BUSINESS ASSET FUNDING CORP.,)	
GE TRANSPORTATION SYSTEMS)	
GLOBAL SIGNALING, L.L.C.)	
<i>Defendants</i>)	

SECOND ANSWER TO INTERROGATORIES

Comes now the petitioner, Samuel K. Lipari (“plaintiff”) appearing pro se and makes the following answers to defendants’ second set of interrogatories. Note the defendants failed to provide a disk or to email a copy of their questions as required under Missouri rules.

1. Persons with knowledge of my damages or injury as a result of the defendants conduct against me:

Lynn Everard
6123 NW 45th Avenue. Coconut Creek, Florida 33073

Patti King 9145 Martin Road
Roswell, Georgia 30076

Suzanne Passalacqua
124 Hillpath. Corte Madera, California 94925
Funding

Chuck Frary
1408 Lark Drive. Evansville, Indiana 47716

Michael Lynch
847.873.4322

Samuel K. Lipari (plaintiff)

2. Expert witnesses.

Lynn Everard
6123 NW 45th Avenue. Coconut Creek, Florida 33073

Patti King 9145 Martin Road
Roswell, Georgia 30076

Suzanne Passalacqua
124 Hillpath. Corte Madera, California 94925

Chuck Frary
1408 Lark Drive. Evansville, Indiana 47716

Michael Lynch
847.873.4322

Samuel K. Lipari (plaintiff)

Elizabeth H. Weatherman
466 Lexington Avenue. New York, New York 10017
Healthcare Investment

Einer Elhauge
Petrie-Flom Center in Health Law Policy, Biotechnology and Bioethics
Harvard Law School
23 Everett Steet, 3rd Floor
Cambridge, MA 02138
Phone:(617) 496-0860
Fax: (617) 496-0861
Email: elhauge@law.harvard.edu

Mark B. Leahey, Esq.
Executive Director
Medical Device Manufacturers Association
1900 K Street, NW, Ste. 100
Washington, D.C. 20006
(202) 496-7124
(202) 496-7756 fax
mleahey@medicaldevices.org

All the above named experts will be testifying on the following subject matter, using
the following facts and opinions based on the same sources:

b. The value proposition of Medical Supply Chain, Inc.'s entry into the hospital supply market.

c. Substance of facts and opinions

1. That competition with General Electric's cartel partners was limited, creating a lucrative market for the supplies and services Medical Supply Chain, Inc. planned to provide.

2. Venture capital was also limited for potential competitors outside of General Electric's cartel, increasing the economic advantage of Medical Supply Chain, Inc. which had obtained funding to enter the market by selling back GE Transportation's lease.

d. Government Inspector General reports, healthcare industry reports, US Senate testimony, investigative journalism. See www.medicalsupplychain.com/news.htm

OATH

I the undersigned hereby swear under oath to the truth of the above statements regarding the production of documents requested by the defendants.

S/Samuel K. Lipari
Samuel K. Lipari

10/01/07
Date

Respectively submitted,

S/Samuel K. Lipari
Samuel K. Lipari
Pro se

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing instrument was served on this 1st day of October, 2007, by hand delivery to:

John K. Power, Esq.
Husch & Eppenberger, LLC
1700 One
Kansas City Place
1200 Main Street
Kansas City, MO
64105-2122

S/Samuel K. Lipari
Samuel K. Lipari
297 NE Bayview
Lee's Summit, MO 64064
816-365-1306
saml@medicalsupplychain.com
Pro se