

FILED
COURT OF CLAIMS
OF OHIO

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ORIGINAL

IN THE COURT OF CLAIMS OF THE STATE OF OHIO

ANN M. HIGGS

Plaintiff,

-vs-

**UNIVERSITY OF TOLEDO
MEDICAL CENTER**

Defendant.

Case No.: 2013-00576

Judge Patrick M. McGrath

**PLAINTIFF'S IDENTIFICATION OF
EXPERT WITNESSES**

Trial Counsel:

Robert M. Scott (0006643)
Lafferty, Gallagher & Scott, LLC
416 North Erie Street, Suite 400
Toledo, OH 43604-5622
(419) 241-5500
(419) 245-3849 (Facsimile)

Attorney for Plaintiff

Now comes the Plaintiff, by and through her counsel, and pursuant to this Court's Pre-Trial Order, hereby discloses the expert witnesses that may be called at the time of trial:

- 1) John Bogdasarian, M.D., F.A.C.S., 33 Electric Ave., Fitchburg, MA (report produced);
- 2) I. Michael Leitman, M.D., F.A.C.S., 1st Ave. @ 16th St., New York, NY (report produced);
- 3) Vincent Toma, M.D., 3829 Woodley Rd., Bldg. B, Toledo, OH (expected to testify in accordance with entries in medical records);
- 4) Bonaventure Okoro, M.D., 5542 Airport Hwy., Toledo, OH (expected to testify in accordance with entries in medical records);
- 5) Hudson Jones, M.D., 620 W. Bancroft St., Toledo, OH (expected to testify in accordance with entries in medical records);
- 6) Michael Benninger, M.D., 8701 Darrow Rd., Twinsburg, OH (expected to

ON COMPUTER

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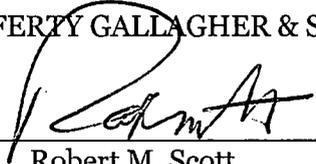
testify in accordance with entries in medical records);

- 7) Jianlin Tang, M.D., 3000 Arlington Ave., Toledo, OH (upon cross-examination);
- 8) Any and all medical personnel identified in Plaintiff's medical records;
- 9) Any and all expert witnesses identified by Defendants, whether or not called as a witness;
- 10) Any and all expert witness identified through the discovery process, which is ongoing;
- 11) Plaintiffs reserve the right to call any and all experts necessary to rebut the opinions and allegations of Defendants' experts; and
- 12) Plaintiffs reserve the right to supplement this listing pending completion of discovery, which is ongoing.

Respectfully submitted,

LAFFERTY GALLAGHER & SCOTT, LLC

By


Robert M. Scott
Attorney for Plaintiff

CERTIFICATE OF SERVICE

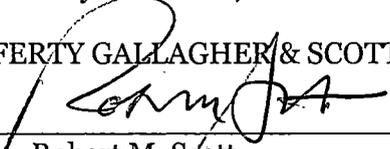
This will certify that *Plaintiff's Identification of Expert Witnesses* was served by electronic mail this 3rd day of November 2014, upon the following:

Anne Berry Strait
Assistant Attorney General
Court of Claims Defense Section
150 East Gay Street, Floor 18
Columbus, OH 43215
anne.strait@ohioattorneygeneral.gov
Attorney for Defendant

Respectfully submitted,

LAFFERTY GALLAGHER & SCOTT, LLC

By


Robert M. Scott
Attorney for Plaintiff

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Jon A. Lafferty
Thomas W. Gallagher
Robert M. Scott
Joseph S. Hartle
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November 3, 2014

Clerk of Courts
Court of Claims of Ohio
The Ohio Judicial Center
65 S. Front, Third Floor
Columbus, OH 43215

Re: *Ann M. Higgs v. UPMC*
Case No.: 2013-00576
Our File No.: 4689

Dear Clerk:

Please find enclosed the original and several copies of *Plaintiff's Identification of Expert Witnesses*.

Please file in your usual manner and return any unused file-stamped copies in the enclosed self-addressed, postage-paid envelope. *IBH*

Thank you for your assistance in this matter.

Sincerely,

LAFFERTY, GALLAGHER & SCOTT, LLC

By

Robert M. Scott

Robert M. Scott
(419) 241-5500, Ext. 113

RMS/nmp
Enclosures
cc: Ann Berry Strait, Esq.