

WENDY DEVINE : IN THE  
 Plaintiff : CIRCUIT COURT  
 v. : FOR  
 LEROY H. CARHART, JR., M.D., et al : MONTGOMERY COUNTY  
 Defendants : Case No.: 425378-V

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**PLAINTIFF'S PRELIMINARY DESIGNATION OF EXPERT WITNESSES**

COMES NOW the Plaintiff, WENDY DEVINE, by her attorneys, Jonathan Schochor, Scott P. Kurlander and Schochor, Federico and Staton, P.A. and designates the following expert witnesses who may be called to testify at trial, in accordance with the Scheduling Order issued by this Honorable Court:

Richard Luciani, M.D.  
 26 Redwood Road  
 Springfield, New Jersey 07081  
 Specialty: Obstetrics and Gynecology

Martin Gubernick  
 131 E 65th St  
 New York, NY 10065  
 Specialty: Obstetrics and Gynecology

Daryl K. Boffard, M.D  
 1323 Stuyvesant Avenue  
 Union, New Jersey 07083  
 Specialty: Obstetrics and Gynecology

Drs. Luciani, Gubernick, and Boffard may be testifying on standard of care, causation and damage issues. Drs. Luciani, Gubernick, and Boffard are available for deposition at a mutually agreeable date, time and location.

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The Plaintiff reserves the right to call as fact or expert witnesses any duly authorized actual and/or apparent agents, servants and employees of the Defendant Germantown Reproductive Health to testify as fact witnesses or as expert medical witnesses.

In addition, the Plaintiff also reserves the right to call as fact witnesses or as expert medical witnesses any witness designated by and/or called by any party in this case. In addition, the Plaintiff reserves the right to call as fact witnesses or expert medical witnesses any physicians, surgeons, nurses or other health care providers affiliated with or working for the Defendant in this case or any of Wendy Devine's treating health care providers including but not limited to Andrew Block, M.D. and Albert Steren, M.D. The Plaintiff reserves the right to call as fact witnesses or as expert medical witnesses any of Wendy Devine's treating physicians, surgeons, nurses or other health care providers not involved with this case. In the event that any of the Defendants name expert witnesses in a specialty or subspecialty not covered by the Plaintiff's designation, the Plaintiff reserves the right to name a rebuttal expert in that area of medicine.

As for the opinions of each expert, the Plaintiff's experts will address the various violations of the standard of care, issues of causation and damages referenced in the Complaint. In the event that more detail is desired with regard to the opinions of the Plaintiff's experts, said detail may be obtained by way of deposition. The Plaintiff will be happy to provide any and all experts for deposition, if requested. Further, if any of the Plaintiff's experts prepare written reports, they will be furnished upon receipt.

Kindly regard this information as supplemental Answers to Interrogatories.

A handwritten signature in cursive script that reads "Scott P. Kurlander". The signature is written in black ink and extends across the width of the page.

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Baltimore, Maryland 21202  
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Attorneys for the Plaintiffs