

**IN THE UNITED STATES DISTRICT COURT
FOR THE _____ DISTRICT OF MISSISSIPPI,
_____ DIVISION**

_____ **PLAINTIFF**
V. **CIVIL ACTION NO.** _____
_____ **DEFENDANT**

DESIGNATION OF EXPERT WITNESSES

COME NOW _____, Plaintiff herein, and hereby designates the following person who may be called to give expert testimony at the trial of this cause:

I. PRELIMINARY STATEMENT REGARDING EXPERT DESIGNATIONS

A. Plaintiff reserves the right to modify and supplement this designation, pursuant to Rule 26 of the Federal Rules of Civil Procedure and 26.1 of the Uniform Local Rules of the United States Court for the Southern District of Mississippi. Plaintiff further reserves the right to supplement this designation as further information and opinions become available. Plaintiff expressly reserves the right to respond with additional designations to any supplemental designations made by Defendant. Plaintiff will reasonably supplement his designations and disclosures of expert testimony, including a copy of any written reports or opinions, to the extent required under Rule 26 of the Federal Rules of Civil Procedure and this Court's Local Rules.

B. Plaintiff reserves the right to rely upon, if appropriate, the expert testimony of one or more of the experts designated by any other party in this proceeding or expressed by any other expert at a deposition, hearing, or trial and to any studies, literature or theories upon which any other experts rely.

C. The expert designated herein has, over the course of his career, reviewed numerous textbooks and articles and cannot possibly recall every piece of literature that he has reviewed. He therefore reserves the right to designate prior to trial any literature and other exhibits that he has relied upon in this matter.

II. DESIGNATION OF EXPERTS

_____ is expected to offer an opinion regarding the current net present value of lost compensation of Plaintiff as a result of his termination by Defendant. Plaintiff reserves the right to have _____ offer testimony regarding other issues raised by Defendant. _____=s opinions will be based on his review, examination and/or knowledge of the pleadings in this case, the federal tax returns of Plaintiff for the years _____, interviews with Plaintiff, documents produced in this case, as well as his experience, education and background. _____=s written report is attached hereto as **Exhibit "A"** and a copy of his curriculum vitae is attached hereto. _____=s rate for testimony and analysis is \$ _____ per hour. A listing of cases in which _____=s has testified as a expert witness in the past seventeen years is also attached.

RESPECTFULLY SUBMITTED this the ____ day of _____, 20____.

_____, **Plaintiff**

By: _____

Plaintiff=s Attorney (MB No. _____)

CERTIFICATE OF SERVICE

I, _____, do hereby certify that a true and correct copy of the above and foregoing Designation of Expert Witnesses has been served, via hand-delivery, upon the following:

COUNSEL FOR _____.

This the ____ day of June, 20__.
