

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
TEXARKANA DIVISION

JOHN WARD, JR.

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C.A. NO. 08-4022  
JURY TRIAL DEMANDED

v.

CISCO SYSTEMS, INC.

**CISCO SYSTEMS, INC.’S DISCLOSURE OF  
REBUTTAL EXPERT WITNESSES**

TO: John Ward, Jr., by and through his attorney of record, Nicholas H. Patton, Patton, Tidwell & Schroeder, LLP, 4605 Texas Boulevard, Texarkana, Texas.

Cisco hereby designates Andy Beal as a rebuttal expert to Kent Campbell and in rebuttal to Plaintiff’s non-retained experts of “all licensed attorneys included in his initial disclosures.” Mr. Beal’s opinions and qualifications are set forth in his expert report, which is attached hereto.

Cisco hereby designates Bruce Curran and Cynthia Paar as rebuttal, non-retained experts to Plaintiff’s designation of Sam Baxter. Mr. Curran is designated to testify that the United States District Court for the Eastern District of Texas uses the national CM/ECF software, concerning the design and intent of that software with respect to filing dates, electronic filing procedures in October of 2007, and whether the United States District Court could have altered the programming of the CM/ECF system to calculate the filed date at a different point during the filing process. Ms. Paar is designated to testified concerning the practice in the Eastern District of Texas concerning the filing of complaints in October of 2007, filing procedures in the Eastern District of Texas in October of 2007, how the electronic filing system was designed to function, and whether

the United States District Court could have altered the programming of the CM/ECF system to calculate the filed date at a different point during the filing process. Both Mr. Curran and Ms. Paar are designated to testify that the electronic case filing system functioned properly when it gave a filed date of October 15, 2007 in the *ESN v. Cisco* lawsuit. Mr. Curran and Mrs. Paar's opinions are set forth in their respective depositions. Mr. Curran and Mrs. Paar are qualified as experts to testify on these topics by their knowledge, skill, experience, training, and education, as set forth in their respective depositions.

Respectfully submitted,

JACKSON WALKER, L.L.P.

By: /s/ Charles L. Babcock

Richard E. Griffin

Arkansas Bar No.: 63020

Email: rgriffin@jw.com

Charles L. Babcock

Federal Bar No.: 10982

Email: cbabcock@jw.com

Crystal J. Parker

Federal Bar No.: 621142

Email: cparker@jw.com

1401 McKinney

Suite 1900

Houston, Texas 77010

(713) 752-4200

(713) 752-4221 – Fax

ATTORNEYS FOR DEFENDANT  
CISCO SYSTEMS, INC.

**CERTIFICATE OF SERVICE**

This is to certify that on this 10th day of December, 2009, a true and correct copy of the foregoing was served via electronic mail upon:

Patricia L. Peden  
Law Offices of Patricia L. Peden  
5901 Christie Avenue  
Suite 201  
Emeryville, CA 94608  
*Attorney for Plaintiff John Ward, Jr.*

Nicholas H. Patton  
Patton, Tidwell & Schroeder, LLP  
4605 Texas Boulevard  
P.O. Box 5398  
Texarkana, Texas 75505-5398  
*Attorney for John Ward, Jr.*

*/s/ Charles L. Babcock*

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Charles L. Babcock