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 16 SOURCE MEDICAL SOLUTIONS, INC.

17 UNITED STATES DISTRICT COURT
 18 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 19 SAN JOSE DIVISION

20 MISHA CONSULTING GROUP, INC., a
 21 California corporation, d/b/a eBUSINESS
 22 DESIGN,

23 Plaintiff/CounterDefendant,

24 vs.

25 SOURCE MEDICAL SOLUTIONS, INC., a
 26 Delaware corporation, P. DARYL BROWN,
 27 an individual and MICHAEL A. PLAIA, an
 28 individual,

Defendant/CounterPlaintiff.

Case No.: C02-04908 JW (HRL)

**DEFENDANT SOURCE MEDICAL
 SOLUTIONS, INC'S AMENDED INITIAL
 DISCLOSURES PURSUANT TO RULE
 26(A)(1) OF THE FEDERAL RULES OF
 CIVIL PROCEDURE**

Action Filed: October 9, 2002
 Trial Date: July 13, 2004

Defendant, SOURCE MEDICAL SOLUTIONS, INC. ("SOURCE") makes the following disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. SOURCE submits these amended disclosures based on the information now reasonably available to it and expressly reserves the right to supplement and/or modify the disclosures as additional information becomes available.

1 **A. WITNESSES**

2 SOURCE identifies the following individuals who are likely to have discoverable
3 information that Defendant may use to support its claims or defenses:

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23 **B. DOCUMENTS**

24 SOURCE has identified and produced copies of all non-privileged documents that are
25 in the possession, custody or control of SOURCE and that SOURCE may use to support its claims or
26 defenses. SOURCE reserves the right to, and will, supplement or amend this disclosure as further
27 discovery is taken in this case.

28 **C. DAMAGES**

29 SOURCE has filed its counterclaims seeking over \$20,000,000 in damages, not
30 including damages which it will also be seeking for lost revenues/sales opportunities for potential or
31 actual clients other than HealthSouth and damages to its business reputation. Source will
32 supplement this disclosure when appropriate.

33 **D. INSURANCE**

34 SOURCE is not aware of any insurance policies called for by Fed.R.Civ.P.
35 26(a)(1)(D) at this time.

1 **E. RIGHT TO SUPPLEMENT**

2 SOURCE reserves the right to, and will, supplement or amend this disclosure as the
3 case progresses and as appropriate.

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5 Dated: March 26, 2004

Respectfully Submitted,

6 SIDLEY AUSTIN BROWN & WOOD LLP

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8
9 By: s/Tracy J. Phillips

10 TRACY J. PHILLIPS

Attorneys for Defendant

11 SOURCE MEDICAL SOLUTIONS, INC.