

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

| | | |
|---------------------------------|---|---------------------------------------|
| LAURA J. LAMBERT |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | CAUSE NO. 1:10-cv-0919-JMS-TAB |
| |) | |
| HUSSEY-MAYFIELD MEMORIAL |) | |
| PUBLIC LIBRARY, |) | |
| |) | |
| Defendant. |) | |

PLAINTIFF’S PRELIMINARY WITNESS LIST

_____ Comes now the Plaintiff, Laura J. Lambert, by counsel, and pursuant to the Case Management Plan approved by the Court, hereby respectfully provides the following preliminary list of individuals who may be called as a witness to give testimony in this Cause. Plaintiff reserves the right to correct, clarify, supplement, or otherwise amend the following list of potential witnesses for any appropriate reason.

1. Plaintiff Laura J. Lambert,
2. Dr. Barbara Freeman, Ph.D.
1717 W. 86th Street, Suite 800N
Indianapolis, Indiana 46260
3. Dr. Kimberly Gatzimos
Zionsville, Indiana
4. Ms. Martha Catt
5. Ms. Shawn Parker
6. Dr. Arthur
Witham Health Services

7. Dr. Presley Buntin
Zionsville, Indiana
8. Mary Rueff
9. Virginia White
10. Jamie Schlenk
11. Susan Jenkins
12. Lee Greaves
13. Marilyn Martin
14. Rick Deuschle
15. Judy Bolinger
16. Phyllis Robinson
17. All individuals who participated in any actions affecting the terms and conditions of Plaintiff's employment,
18. Any individual who replaced Plaintiff and/or assumed her duties and responsibilities upon her separation,
19. Any person necessary for the foundation of documents,
20. Any accounting/billing/other personnel of Defendant who can testify about Plaintiff's work hours, full-time benefits and pay rate,
21. Any and all similarly situated individuals,
22. Any person identified in any discovery answer or response or identified during the discovery process,
23. Any individual necessary for impeachment or rebuttal purposes,
24. Any individual identified on any witness list filed by Defendant,
25. Any individual listed on parties' initial disclosures,

26. Any expert or individual necessary to establish the value of the damages suffered by Plaintiff,
27. Any expert or individual necessary to establish the disability of Plaintiff including, without limitation, all of her health care providers,
28. All individuals responsible for the implementation and administration of Defendant's employment policies and procedures,
29. All individuals who participated in actions concerning the termination of Plaintiff and the decision to terminate Plaintiff,
30. All individuals who participated in events leading to the termination of Plaintiff,
31. All individuals who participated in actions concerning the decision to retain Susan Jenkins,
32. All individuals who investigated complaints of discrimination made by Plaintiff,
33. All individuals who participated in decision concerning Plaintiff's request for reasonable accommodations,
34. All individuals who participated in decision to terminate Plaintiff,
35. All individuals who evaluated Plaintiff's work performance and the work performance of similarly situated individuals,
36. Custodian of Defendant's records.

Plaintiff reserves the right to correct, clarify, supplement, or otherwise amend the following list of potential witnesses for any appropriate reason.

Respectfully submitted,

/s/ Richard W. McMinn
Richard W. McMinn, Attorney No. 13715-49
One of the Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was electronically filed this 16th day of December, 2010. Parties may access this filing through the Court's electronic filing system. Notice of this filing will be sent to the following counsel of record by operation of the Court's system:

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/s/ Richard W. McMinn

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