

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

LAURA J. LAMBERT,

Plaintiff,

v.

**HUSSEY-MAYFIELD MEMORIAL
PUBLIC LIBRARY,**

Defendant.

Cause No. 1:10-cv-0919-JMS-TAB

DEFENDANT'S PRELIMINARY WITNESS LIST

Defendant Hussey-Mayfield Memorial Public Library ("the Library") provides the following preliminary list of witnesses it may call at a trial of this matter:

1. Martha Catt
2. Shawn Parker
3. Mary Rueff
4. Phyllis Robinson
5. Richard Deuschle
6. All witnesses listed on Plaintiff's Preliminary and Final Witness Lists.
7. All witnesses identified through discovery.
8. All witnesses necessary for rebuttal or impeachment.
9. Records custodians and other persons necessary to establish the authenticity of items listed on Defendant's Preliminary and Final Exhibit Lists.

The Library reserves the right to supplement this list as discovery continues.

Respectfully submitted,

/ s / Jane Ann Himsel

Jane Ann Himsel (#15192-49)

Brian L. Mosby (#26096-29)

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*Attorneys for Defendant Hussey-Mayfield
Memorial Public Library*

CERTIFICATE OF SERVICE

I hereby certify that I have this 20th day of January 2011, served a copy of the foregoing *Defendant's Preliminary Witness List* electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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/s/ Jane Ann Himsel