Filed 03/23/2007

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF KENTUCKY **CENTRAL DIVISION at LEXINGTON CIVIL ACTION NO. 5:07-29-JMH** [FILED ELECTRONICALLY]

BARBARA OLINGER, as Mother and Next Friend of "A", as Minor Child Under the Age of 18 Years,

PLAINTIFF

V. PLAINTIFF BARBARA OLINGER, AS MOTHER AND NEXT FRIEND OF "A", A MINOR CHILD UNDER THE AGE OF 18 YEARS RULE 26(a)(1) INITIAL DISCLOSURES

THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, and JASON STARKS,

DEFENDANTS

Plaintiff Barbara Olinger, as Mother and Next Friend of "A", a Minor Child Under the Age of 18 Years, by counsel, makes the following initial disclosures under Federal Rule of Civil Procedure 26(a)(1) pursuant to the Report of Parties' Planning Meeting filed on March 9, 2007, reserving the right to supplement these disclosures as necessary given continuing discovery.

WITNESSES A.

The following individuals may have discoverable information:

- 1. Plaintiff;
- 2. John Mark Olinger;
- 3. John Curtis Olinger;

- 4. Nevon Williams;
- 5. Dylan Hoskins;
- 6. Defendant Jason Starks;
- 7. Witnesses identified in the case of *Commonwealth v. Jason Stark*, Lee Circuit Court Case No. 06-CR-00001, including Kentucky State Police Detective Kenneth Bradley; and
- 8. Any and all witnesses identified by Defendant Jason Starks and/or the Defendant The Church of Jesus Christ of Latter-Day Saints

B. <u>DOCUMENTS OR OTHER TANGIBLE ITEMS</u>

The Plaintiff has made no decision as to documents or other tangible items that are in her possession or control that are to be produced relating to claims of this action as of this date. Plaintiff reserves the right to supplement the documents or other tangible items at a later date pursuant to the Report of Parties' Planning Meeting filed late herein, reserving the right to supplement the initial discovery as necessary given continuing discovery.

C. COMPILATION OF DAMAGES

- Plaintiff claims compensatory damages in an amount in excess of \$500,000.
- 2. Plaintiff claims medical damages in an amount in excess of \$5,000 for past medical expenses and \$100,000 for future medical expenses.
- 3. Plaintiff claims punitive damages in an amount in excess of \$500,000.

D. INSURANCE AGREEMENT

None.

Respectfully submitted,

/s/ Michael A. Stidham Michael A. Stidham STIDHAM & FRANCISKY 500 Brown St. P.O. Box 732 Jackson, KY 41339 Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was this 23rd day of March, 2007 filed electronically via the Court's CM/CEF system, which effects service via email upon the following:

Jon L. Fleischaker DINSMORE & SHOHL LLP 1400 PNC Plaza 500 West Jefferson St. Louisville, KY 40202

Bernard Pafunda Pafunda Law Office 175 E. Main St. Suite 600 Lexington, KY 40507

> /s/ Michael A. Stidham Counsel for Plaintiff