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8 Attorney for Plaintiff
9 Jason Renshaw

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF CONTRA COSTA

13 JASON RENSHAW,

CASE NO. C04-01130

14 Plaintiff,

PLAINTIFF'S EXPERT WITNESS LIST

15 vs.

AND DECLARATION

16 TRI-UNION SEAFOODS, LLC, et al.,

17 Defendants.

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23 Pursuant to Code of Civil Procedure § 2034, plaintiff Jason Renshaw hereby provides a
24 list of the names and addresses of those persons whose expert opinion plaintiff may offer at the
25 trial of this action.

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Plaintiff's Expert Witness List and Declaration

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- (1) Ron Kennedy, M. D.
2448 Guereville Rd., Suite 800
Santa Rosa, CA 95401

- (2) Carl R. Corrigan, M. D.
Kaiser Permanente
3400 Delta Fair Blvd.
Antioch, CA 94509

- (3) Steven M. Fredman, M. D.
Kaiser Permanente
1425 S. Main Street
Walnut Creek, CA 94596

- (4) Theodore R. Levin, M. D.
Kaiser Permanente
1425 S. Main Street
Walnut Creek, CA 94596

- (5) Jane Hightower, M. D.
2100 Webster Street, Suite 418
San Francisco, CA

DECLARATION

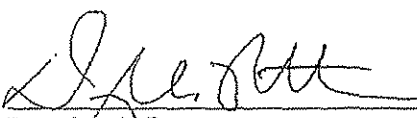
All of the persons listed above have been plaintiff's treating physicians. They have not been retained by plaintiff to render expert opinions, except that plaintiff intends to retain Dr. Hightower to render expert opinions. Dr. Hightower is a medical doctor licensed in the State of California with a specialty in internal medicine. She received her medical degree from the University of Illinois at Chicago Medical School in 1988 and performed her residency at St. Mary's Hospital and Medical Center in San Francisco, California. As part of her private practice, Dr. Hightower has performed extensive

1 research and clinical studies regarding mercury poisoning and the dangers of mercury in
2 fish. It is expected that she will testify in the present case regarding Jason Renshaw's
3 symptoms and conditions, the relationship between those symptoms and conditions and
4 his ingestion of canned tuna, and the general dangers of mercury in canned tuna. Dr.
5 Hightower has been on an extended vacation and, thus, has not yet specifically advised
6 plaintiff's counsel that she has agreed to testify at trial. Dr. Hightower is sufficiently
7 familiar with the pending case to provide a meaningful oral deposition concerning the
8 specific testimony she is expected to give at trial, including any opinions and their bases.
9 It is expected that Dr. Hightower will be back from vacation on Monday, September 12,
10 2005 and plaintiff's counsel will advise defendant's counsel at that time about Dr.
11 Hightower's fees.

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13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing statements are true and correct.

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17 LAW OFFICES OF DOUGLAS A. PRUTTON

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19 Dated: September 6, 2005

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21 Douglas A. Prutton
22 Attorney for Plaintiff Jason Renshaw