

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Artis Hickman	:	
	:	Case No. 1:07-cv-316
Plaintiff,	:	
	:	Judge Sandra S. Beckwith
v.	:	Magistrate Judge Timothy S. Hogan
	:	
Cincinnati Bell, Inc.	:	
	:	
	:	
Defendant.	:	

**DEFENDANT CINCINNATI BELL, INC.'S RULE 26 DISCLOSURES,
WITNESS LIST AND SUMMARY**

Now comes Defendant Cincinnati Bell, Inc. and tenders the following as its Rule 26 Disclosures, Witness List and Summary.

PRIOR RULE 26 DISCLOSURES

1. Defendant hereby adopts and incorporates as if set forth herein the Initial Disclosures tendered to Plaintiff on or about October 1, 2007.

SUMMARY OF WITNESS TESTIMONY

2. *Theresa Greenwald*. It is anticipated that Ms. Greenwald will testify regarding various medical examination of Plaintiff, related facts regarding Plaintiff's claims, and the facts surrounding Plaintiff's termination.
3. *Dr. Shyamala Jagtap*. It is anticipated that Dr. Jagtap will testify regarding her examination and other contact with Plaintiff during relevant time periods.
4. *Michelle Simpson*. It is anticipated that Ms. Simpson will be called to testify regarding the facts involved in Plaintiff's termination and various HR policies and procedures of Defendant Cincinnati Bell, Inc.
5. All witnesses identified by Plaintiff.

DOCUMENTS AND TANGIBLE THINGS

6. Defendant adopts all documents and tangible things set forth in its Initial Disclosures and reserves the right to use each of the documents as an exhibit in the trial herein. Defendant anticipates that each of Plaintiff's medical records disclosed during discovery will be used as exhibits at trial. Defendant further anticipates that it will introduce the medical records from Consentra regarding various examinations of Plaintiff including notes from Theresa Greenwald and handwritten notes of Dr. Jagtap.

SUPPLEMENT

7. Defendant supplements its previous disclosures and hereby identifies all documents produced in discovery including documents related to the company's policies and procedures on medical examinations.

DISCOVERY NOT COMPLETE

8. As discovery is not complete in this matter, Defendant reserves the right to further supplement its Rule 26 Disclosures as well as the Witness List at the conclusion of discovery. Defendant will timely supplement these disclosures upon the conclusion of discovery.

Respectfully submitted,

s/ Nathaniel Lampley, Jr.

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Attorney for Defendant
Cincinnati Bell, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of May, 2008 a copy of the foregoing was filed electronically. Notice of this filing will be sent to Plaintiff's counsel by operation of the Court's electronic filing system to:

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s/ Nathaniel Lampley, Jr.

Nathaniel Lampley, Jr.