

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ELIZABETH A. GILMORE,

Plaintiff

V.

FULBRIGHT & JAWORSKI L.L.P.,

Defendant

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C. A. NO. 4:06-CV-03849

JURY

**PLAINTIFF ELIZABETH A. GILMORE'S
RULE 26(a)(2) DESIGNATION OF EXPERTS**

In accordance with Rule 26(a)(2) of the Federal Rules of Civil Procedure, Plaintiff, Elizabeth A. Gilmore, respectfully designates the following experts:

A. Experts

- (1) Joe Sneed
699 F.M. 2027
Cameron, Texas 76520-5040
(979) 364-2767

Plaintiff's attorney/attorney's fees

See all documents generated, or to be generated, in this lawsuit. No formal reports have been prepared or are anticipated.

- (2) Randal A. Kauffman
P.O. Box 1211
Tomball, Texas 77377-1211
(281) 290-9759

Plaintiff's attorney/attorney's fees

See all documents generated, or to be generated, in this lawsuit. No formal reports have been prepared or are anticipated.

B. Treating Experts

- (1) Howard. K. Wilson, M.D.
1200 Binz Street, Suite 1410
Houston, Texas 77004
(713) 523-9508

Howard K. Wilson, M.D., and any and all other health care providers associated with Howard K. Wilson, M.D., involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Howard. K. Wilson, M.D.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (2) Richard Johnson, M.D.
Diagnostic Clinic of Houston
1200 Binz Street
Houston, Texas 77004
(713) 797-9191

Richard Johnson, M.D., and any and all other health care providers associated with Richard Johnson, M.D., involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is

willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Richard D. Johnson, M.D.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (3) E. Russell Weidman, M.D.
Texas Institute of Reproductive Medicine & Endocrinology
7400 Fannin, Suite 850
Houston, Texas 77054
(713) 791-1874

E. Russell Weidman, M.D., and any and all other health care providers associated with E. Russell Weidman, M.D., involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for E. Russell Weidman, M.D.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (4) St. Luke's Community Medical Center
17200 St. Luke's Way
The Woodlands, Texas 77384
(936) 266-2000

St. Luke's Community Medical Center and any and all other health care providers associated with St. Luke's Community Medical Center involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for St. Luke's Community Medical Center

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (5) Memorial Hermann - The Woodlands
9250 Pinecroft
The Woodlands, Texas 77380
(281) 364-2300

Memorial Hermann – The Woodlands and any and all other health care providers associated with Memorial Hermann – The Woodlands involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Memorial Hermann – The Woodlands.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (6) Jeffrey Kelley, D.O.
12522 Greenspoint Drive
Houston, Texas
(281) 876-2300

Jeffrey Kelley, D.O., and any and all other health care providers associated with Jeffrey Kelley, D.O., involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Jeffrey Kelley, D.O.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (7) George P. Noon, M.D.
6560 Fannin St., Suite 1860
Houston, Texas 77030
(713) 790-3155

George P. Noon, M.D., and any and all other health care providers associated with George P. Noon, M.D., involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for George P. Noon, M.D.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

(8) The Methodist Hospital
6565 Fannin Street
Houston, Texas 77030
(713) 790-3311

The Methodist Hospital and any and all other health care providers associated with The Methodist Hospital involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for The Methodist Hospital.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (9) Robert K. Zurawin, M.D.
Baylor College of Medicine
Dept. of Obstetrics & Gynecology
6560 Fannin, Suite 901
Houston, Texas 77040
(713) 798-7500

Robert K. Zurawin, M.D., and any and all other health care providers associated with Robert K. Zurawin, M.D., involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Robert K. Zurawin, M.D.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (10) George G. Hughes, M.D.
1001 Medical Plaza Dr., Ste. 220
Spring, Texas 77380
(281) 296-0400

George G. Hughes, M.D., and any and all other health care providers associated with George G. Hughes, M.D., involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for George G. Hughes, M.D.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (11) Digestive and Liver Disease Consultants, P.A.
Northwest Medical Plaza
275 Lantern Bend, Suite 200
Houston, Texas 77090
(281) 440-0101

Digestive and Liver Disease Consultants, P.A., and any and all other health care providers associated with Digestive and Liver Disease Consultants, P.A., involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Digestive and Liver Disease Consultants, P.A.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (12) Quest Diagnostics
The Woodlands Professional Building
920 Medical Plaza Dr., Suite 480
The Woodlands, Texas 77380
(281) 296-8200

Quest Diagnostics and any and all other health care providers associated with Quest Diagnostics involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Quest Diagnostics.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (13) Denise J. Guiffrida, M.D.
910 Travis Street South
Houston, Texas 77002
(713) 652-5111

Denise J. Guiffrida, M.D., and any and all other health care providers associated with Denise J. Guiffrida, M.D., involved in the examination,

diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Denise J. Guiffrida, M.D.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

(14) Alan G. Selbst, DDS
Houston Endodontic Specialists
902 Frostwood Drive, Suite 112
Houston, Texas 77024-2401
(713) 461-1166

Alan G. Selbst, DDS, and any and all other health care providers associated with Alan G. Slebst, DDS, involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Alan G. Selbst, DDS

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (15) Robert C. Fulweber, M.D.
6560 Fannin, Suite 1562
Houston, Texas 77030
(713) 797-9483

Robert C. Fulweber, M.D., and any and all other health care providers associated with Robert C. Fulweber, M.D., involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Robert C. Fulweber, M.D.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (16) Bernard M. Barrett
6624 Fannin, Suite 2200
Houston, Texas 77030
(713) 790-9000

Bernard M. Barrett and any and all other health care providers associated with Bernard M. Barrett involved in the examination, diagnosis, care, or

treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Bernard M. Barrett.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

(17) Drs. Rainey and Beaver
2727 Holcombe, 4th Floor
Houston, Texas 77025
(713) 442-0000

Drs. Rainey and Beaver and any and all other health care providers associated with Drs. Rainey and Beaver involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Drs. Rainey and Beaver.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by

custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (18) Luisa Lohner
4801 Woodway Dr.
Houston, Texas 77056
(713) 627-8780

Luisa Lohner and any and all other health care providers associated with Luisa Lohner involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Luisa Lohner.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

- (19) Gary Smith
Houston Urologic Assoc.
6560 Fannin
Houston, Texas 77030
(713) 790-9779

Gary Smith and any and all other health care providers associated with Gary Smith involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also

execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Gary Smith.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

(20) Michael Marlow, D.O.
Alden Health Center
8000 Research Forest Drive, Suite 380
The Woodlands, Texas 77382
(281) 296-5000

Michael Marlow, D.O., and any and all other health care providers associated with Michael Marlow, D.O., involved in the examination, diagnosis, care, or treatment of Plaintiff. Medical facts and opinions concerning examination, diagnosis, care, treatment, or evaluation of Plaintiff.

Medical experts, treating physicians not retained by, employed by, or otherwise subject to the control of Plaintiff. Plaintiff has produced/is willing to produce all medical records in her possession. Plaintiff will also execute a medical authorization to allow Defendant to obtain additional information if described by Defendant.

No report will be furnished as medical expert treating physician not retained by, employed by, or otherwise subject to control by Plaintiff.

Custodian of records for Michael Marlow, D.O.

Testimony concerning authenticity and business records of these records. Custodian of medical records not retained by, employed, or otherwise subject to control of Plaintiff. See any and all affidavits executed by custodian after execution along with copies of any and all documents attached thereto. No report will be furnished as not retained by, employed by, or otherwise subject to control of Plaintiff.

DATED: July 31, 2007.

Respectfully submitted,

s/Joe Sneed

Joe Sneed,
Attorney-In-Charge for Plaintiff
Federal I.D. No. 1072
State Bar No. 18785900
699 FM 2027
Cameron, Texas 76520-5040
(979) 364-2767 (Telephone)
joesneedatty@yahoo.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of a duplicate of the above and foregoing Rule 26(a)(2) Designation of Experts of Plaintiff Elizabeth A. Gilmore has been served upon all opposing parties, or their attorneys of record, by either certified mail, return receipt requested, hand delivery, or telephonic or electronic document transfer on the 31st day of July, 2007.

Lawrence H. Clore
Fulbright & Jaworski L.L.P.
1301 McKinney, Suite 5100
Houston, Texas 77010-3095

Via Hand Delivery

s/Joe Sneed

Joe Sneed