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 Eymann Allison Hunter Jones, P.S.
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 Spokane, WA 99206
 6 (509) 924-9800

7 Attorneys for Plaintiff

8 UNITED STATES DISTRICT COURT FOR THE
 9 EASTERN DISTRICT OF WASHINGTON

10 THOMAS A. WAITE,

No. CV-05-399-EFS

11 Plaintiff,

**PLAINTIFF'S SECOND
 SUPPLEMENTAL
 IDENTIFICATION OF EXPERT
 WITNESSES AND DISCLOSURE
 OF EXPERTS' PRELIMINARY
 REPORTS**

12 vs.

13 THE CHURCH OF JESUS CHRIST OF
 LATTER DAY SAINTS d/b/a
 14 CORPORATION OF THE PRESIDING
 BISHOP OF THE CHURCH OF JESUS
 CHRIST OF LATTER DAY SAINTS, a
 15 Utah corporation, d/b/a
 CORPORATION OF THE PRESIDENT
 16 OF THE CHURCH OF JESUS CHRIST
 OF LATTER DAY SAINTS, a Utah
 17 corporation; DONALD C. FOSSUM;
 18 and STEVEN D. BRODHEAD,

19 Defendants.

20 Plaintiff, by and through his undersigned attorneys, hereby supplements his
 21 original and first supplemental expert witness disclosure as follows:

- 22 1. Anthony J. Choppa, M.Ed., C.R.C.
 23 Vocational Rehabilitation Counselor
 OSC Vocational Systems, Inc.
 24 10132 NE 185th
 Bothell, WA 98011

25
 26 **EYMANN ALLISON HUNTER JONES P.S.**

Susan Skinner, M.D.'s executed letter with her initialed Life Care Plan as prepared by Mr. Choppa are attached as Exhibit "A."

Plaintiff reserves the right to further supplement his disclosures as discovery is ongoing.

DATED this 3rd day of January, 2007.

EYMANN ALLISON HUNTER JONES, P.S.

BY s/ Richard C. Eymann
RICHARD C. EYMANN, WSBA #7470
Co-counsel for Plaintiff

NORDSTROM & NEES, P.S.

BY Telephonically approved 1/3/07
STEPHEN L. NORDSTROM, WSBA #11267
Co-counsel for Plaintiff

EYMANN ALLISON HUNTER JONES P.S.

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CERTIFICATE OF SERVICE

I, RICHARD C. EYMANN, hereby certify that on the 3rd day of January, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following participants:

Brian T. Rekofke
Witherspoon Kelley Davenport & Toole
1100 U.S. Bank Building
422 W. Riverside Avenue
Spokane, WA 99201

Andrew C. Smythe
Paine Hamblen Coffin Brooke & Miller
717 W. Sprague Avenue, Suite 1200
Spokane, WA 99201

s/Richard C. Eymann
RICHARD C. EYMANN

EYMANN ALLISON HUNTER JONES P.S.

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Exhibit "A"



OSC VOCATIONAL SYSTEMS, INC.

November 13, 2006

Susan Skinner, M.D.
411 N. Lakeview Ave.
Anaheim, CA 92807

Re: Thomas Waite

DOI: 08/21/03

Dear Dr. Skinner:

Thank you for speaking with us regarding Thomas Waite's current and future needs. To ensure we have accurately understood your medical and rehabilitation recommendations, please review the enclosed Preliminary Care Plan to ensure it reflects what is necessary and appropriate for treatment of his traumatic brain injury.

Upon your review, please provide your concurrence and/or comment on the format provided below as to whether the Care Plan, on a more probable than not basis, reflects your recommendations for Thomas.

____ The medical and rehabilitation recommendations contained in the Care Plan are necessary and appropriate for Thomas Waite.

Comments: *I agree with those parts of plan assigned to my name, although I suspect your cost assessments of labs are high.*
Susan Skinner *ms* *11/21/06*
Susan Skinner, M.D. Date

- Main Office (Bothell) • 10132 N.E. 185th Bothell, WA 98011 • (425) 486-4040 Fax: (425) 486-8701
- Edmonds Office • 7500 212th St. S.W., Suite 110 Edmonds, WA 98026 • (425) 672-9600 Fax: (425) 776-5375
- Bellingham Office • 114 W. Magnolia St., Suite 303 Bellingham, WA 98225 • (360) 734-9163 Fax: (360) 738-9524
- Mt. Vernon Office • 1419 E. College Way Mt. Vernon, WA 98273 • (360) 424-6239 Fax: (360) 428-4161
- Burien Office • 601 SW 152nd St Burien, WA 98166 • (206) 243-1300 Fax: (206) 243-0366
- Tacoma Office • 917 Pacific Ave #308 Tacoma, WA 98402 • (253) 779-5485 Fax: (253) 779-5486
- Olympia Office • 2101 4th Ave Suite 101 Olympia, WA 98506 • (360) 352-5078 Fax: (360) 352-5417
- Kingston Office • 26121 Calvary Lane Suite 250 Kingston, WA 98346 • (360) 297-0531 Fax: (360) 297-0532
- Spokane Office • 1814 N. Normandie Spokane, WA 99205 • (509) 325-7766 Fax: (509) 325-7666
- Moses Lake Office • 406 W. Broadway, Suite G Moses Lake, WA 98837 • (509) 766-0379 Fax: (509) 765-1392

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Thomas Waite
November 13, 2006
Page 2

Please return the signature page with your signature via facsimile at 425-486-8701 or in the enclosed self-addressed, stamped envelope. Thank you for your assistance.

Sincerely,



Anthony J. Choppa, M.Ed., CRC, CCM
Rehabilitation Counselor/Case Manager

Enclosures: Preliminary Care Plan
Self-addressed envelope

cc: Richard Eymann
Thomas Waite c/o Richard Eymann

PRELIMINARY

CARE PLAN

FOR

THOMAS WAITE

CURRENT AGE TO LIFE EXPECTANCY

NOVEMBER 2006

**Anthony J. Choppa, M.Ed., C.R.C., C.C.M.
OSC Vocational Systems, Inc.
10132 NE 185th St.
Bothell, WA 98011**

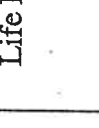
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**PRELIMINARY CARE PLAN
NAME: THOMAS WAITE**

DOI: 8/21/03

ITEM	PURPOSE	PROVIDER	AGE/INITIATED AGE/SUSPENDED	REPLACEMENT RATE	BASE COST
Neurological Evaluation, Monitoring and Treatment	Monitor neurological sequelae including cognitive deficits and seizure status. Management of pharmacologic intervention.	Susan Skinner, M.D. or local provider 	Current Age to Life Expectancy	Office visit in approximately 6 months, then average yearly	\$144.00 - \$202.00 per visit
Neuropsychological Re-evaluations	Ongoing monitoring of cognitive and emotional status, provide recommendations to address treatment options and/or appropriate accommodations with regard to educational/vocational pursuits and other challenges.	William Burkhardt, Ph.D. or local provider	Current Age to Life Expectancy	Average every 3 - 5 years	\$1,750.00 per evaluation

PROJECTED EVALUATIONS



VOCATIONAL SYSTEMS, INC.

**PRELIMINARY CARE PLAN
NAME: THOMAS WAITE**

DOI: 8/21/03

ITEM	PURPOSE	PROVIDER	AGE/INITIATED AGE/SUSPENDED	REPLACEMENT RATE	BASE COST
Psychotherapy (Individual)	Address cognitive behavioral intervention for symptoms of depression and anxiety, and assist with attention, concentration and ability to focus.	Barry Moss, Ph.D., Lauren Schwartz, Ph.D., or local provider	Current Age to Life Expectancy	Average 2 times per week for 18 months ----- Then 1 time per week for 3 - 5 years ----- Then 6 - 12 times per year to Life Expectancy	\$135.00 - \$150.00 per session
Cognitive Remediation Evaluation, Monitoring and Treatment	Periodic consultation with a Speech Language Pathologist to assist Thomas with maintaining and updating his compensatory strategies during major life changes including job and relationship changes. Communication and coordination with Psychotherapist.	Rancho Los Amigos, Newport Language & Speech Center, or local provider	Current Age to Life Expectancy	3 - 6 sessions total	\$60.00 - \$120.00 per session

PROJECTED THERAPEUTIC MODALITIES



**PRELIMINARY CARE PLAN
NAME: THOMAS WAITE**

DOI: 8/21/03

ITEM	PURPOSE	PROVIDER	AGE/INITIATED AGE/SUSPENDED	REPLACEMENT RATE	BASE COST
Dilantin Level	Monitor therapeutic medication levels and health status.	Lakeview Medical Offices, Anaheim, CA, or local provider	Current Age to Life Expectancy	In approximately 6 months, then average 1 time per year	\$121.00 each
Complete Blood Count (CBC)	Monitor for general health status.	Lakeview Medical Offices, Anaheim, CA, or local provider	Current Age to Life Expectancy	In approximately 6 months, then average 1 time per year	\$71.00 each
Alanine Aminotransferase (ALT)	Monitor liver function.	Lakeview Medical Offices, Anaheim, CA, or local provider	Current Age to Life Expectancy	In approximately 6 months, then average 1 time per year	\$49.00 each
Aspartate Aminotransferase (AST)	Monitor liver function.	Lakeview Medical Offices, Anaheim, CA, or local provider	Current Age to Life Expectancy	In approximately 6 months, then average 1 time per year	\$47.00 each
Venipuncture	Blood draw	Lakeview Medical Offices, Anaheim, CA, or local provider	Current Age to Life Expectancy	In approximately 6 months, then average 1 time per year	\$15.00 each

DIAGNOSTICS



**PRELIMINARY CARE PLAN
NAME: THOMAS WAITE**

DOI: 8/21/03

ITEM	PURPOSE	PROVIDER	AGE/INITIATED AGE/SUSPENDED	REPLACEMENT RATE	BASE COST
Dilantin* (400 mg) night	Manage and reduce risk of seizures.	Walgreens or local pharmacy	Current Age to Life Expectancy	Monthly	\$48.00
Celexa	Manage depression.	Walgreens or local pharmacy	Current Age to Life Expectancy	Monthly	Pending

MEDICATIONS¹

¹ Reflects current use. Physician may choose to alter or change medication over time. Dr. Burkhart recommends antidepressant medication such as Celexa be included.



VOCATIONAL SYSTEMS, INC.

PRELIMINARY CARE PLAN
NAME: THOMAS WAITE

DOI: 8/21/03

ITEM	PURPOSE	PROVIDER	AGE/INITIATED AGE/SUSPENDED	REPLACEMENT RATE	BASE COST
Case Management	Coordinate medical and rehabilitation providers, identify appropriate providers, and access resources to assure cost effectiveness, quality of services and crisis intervention.	Local Certified Rehabilitation Counselor or Certified Case Manager	Current Age to Life Expectancy	Average 1 time per month (2 - 3 hours) for the first year upon completion of school ----- Then 1 time per quarter (2 - 3 hours) for life	\$115.00 - \$165.00 per hour
HOME CARE/RESIDENTIAL CARE					

* Services currently being provided by mother.



VOCATIONAL SYSTEMS, INC.

**PRELIMINARY CARE PLAN
NAME: THOMAS WAITE**

DOI: 8/21/03

ITEM	PURPOSE	PROVIDER	AGE/INITIATED AGE/SUSPENDED	REPLACEMENT RATE	BASE COST
Tutoring	Specific one-on-one assistance with study skills due to continued memory and organizational impairment.	Fullerton College or local provider	Current Age for 2 - 3 years	Weekly (1 - 2 hours) (Professional intervention above and beyond peer tutoring)	\$60.00 per hour
Functional Vocational Assessment/Counseling	Provide informational input for curriculum planning and transition from school to post schoolwork. Provide and determine vocational skills, information regarding interests, time management, self-regulation on the job, and appropriate behavior.	Local Certified Rehabilitation Counselor	Current Age to Life Expectancy	Minimum 1 - 2 times (15 - 20 hours each)	\$130.00 - \$165.00 per hour
EDUCATIONAL/VOCATIONAL NEEDS					

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