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5 Attorneys for Plaintiff(s),
[CLIENT'S NAME(S)]

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF [COUNTY], [DISTRICT]

10 [PLAINTIFF(S)], an individual,
11 Plaintiff,
12 vs.
13 [DEFENDANT(S)], and DOES 1 to [#],
14 inclusive,
15 Defendants.

Case No. []
Honorable []
[Dept. [#]]

**PLAINTIFF'S DESIGNATION OF
EXPERT WITNESSES (C.C.P. 2034 et
seq.); DECLARATION OF DANIEL E.
SELARZ, ESQ.; EXHIBITS**

(Code of Civil Procedure section §2034)

Action Filed: []
Trial Date: []

18 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

19 PLEASE TAKE NOTICE that PLAINTIFF [CLIENT'S NAME] ("Plaintiff"),
20 hereby submits [his/her] expert witness designation and submits the following expert
21 witnesses who may be called at trial of the above-captioned matter:
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INTRODUCTION

In providing this list, Plaintiff reserves the right to ask opinion questions or expert witness questions of any and all witnesses who, although expert, are percipient to any issue heretofore or hereafter raised in this case. Such percipient witnesses are not necessarily included in this list.

Plaintiff expressly reserves the right to retain and call at the time of trial additional other prospective witnesses in the event that the deposition testimony from the various experts designated by other parties to this lawsuit should make such further action necessary in the interest of fairness and justice.

Plaintiff nominates the following categories of experts. Should new allegations or contentions be made, Plaintiff reserves the right to nominate, and to call at the time of trial, such further experts, as Plaintiff may deem advisable or appropriate. Plaintiff invites Defendant [DEFENDANT’S NAME] (“Defendant”), or any other party herein, to make known to Plaintiff its contentions or allegations not previously set forth.

RETAINED EXPERTS

Plaintiff hereby designates the following additional retained expert witness, which may be called at trial pursuant to Code of Civil Procedure §§ 2034.230 and 2034.280:

- 1. [Expert Name, Company/Office Name, Address, Telephone No.].

Plaintiff reserves the right to designate additional or supplemental expert witnesses, as well as expert witnesses for purpose of rebuttal as authorized by Code of Civil Procedure section 2034.280. Moreover, Plaintiff specifically reserve all rights conferred by California Code of Civil Procedure 2034.010-2034.730.

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NON-RETAINED EXPERTS

Plaintiff hereby designates the following non-retained expert witnesses, which may be called at trial pursuant to Code of Civil Procedure § 2034.230:

2. **[Expert Name, Company/Office Name, Address, Telephone No.]**.

Plaintiff additionally designates as non-retained experts, all other physicians, physical therapists, chiropractors, or other medical providers that Plaintiff was examined by and/or treated by for injuries allegedly sustained in this accident, as well as for any pre-existing and/or subsequent injuries that have any bearing upon plaintiff’s injury allegations pertaining to this accident.

Pursuant to California Code of Civil Procedure, Section 2034(m)(1), Plaintiff reserves the right to call all experts listed and deposed by, or on behalf of, the other parties involved in this litigation. Thus, Plaintiff incorporates by reference, as though fully set forth herein, all information supplied by those other parties as to their experts in their lists of expert witnesses.

Plaintiff further reserves the right to name and call any other expert witnesses as provided by California Code of Civil Procedure, Section 2034.

A declaration in compliance with the Code of Civil Procedure § 2034.230, is attached to this list.

DATED: May 23, 2018

SELARZ LAW CORP.

By: _____

Daniel E. Selarz, Esq.
Attorneys for Plaintiff(s),
[Client’s Name(s)]

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DECLARATION OF DANIEL E. SELARZ, ESQ.

I, Daniel E. Selarz, declare:

1. I am an attorney licensed to practice before all courts of the State of California. I am an attorney of the law firm of SELARZ LAW CORP., attorneys of record for PLAINTIFF(S) [CLIENT'S NAME] ("Plaintiff(s)"). I have personal knowledge of the facts in this declaration and if called as a witness could and would competently testify thereto. I make this declaration in support of Plaintiff's Designation of Expert Witnesses.

2. All of the experts listed above will offer opinion testimony at the trial of this action, either orally or by deposition.

3. All of the experts listed above have agreed to testify at trial and will be sufficiently familiar with the pending litigation to provide testimony at a deposition.

4. Attached hereto and incorporated herein by this reference and resumes of the professional qualifications of said designated retained experts as well as all discoverable reports authored by each designated retained expert. **All of the experts retained and designated by Plaintiff are expected to have additional discovery materials provided to them including depositions of other experts and materials for review and comment as they deem fit.**

5. [Expert Name], is a [Type of Expert]. Attached hereto as Exhibit "A" and incorporated herein by this reference is the resume of the professional qualifications of [Expert Name].

6. [Expert Name] is expected to testify and offer opinions and conclusions regarding his review of any and all medical records, x-rays and/or MRI films, pertaining to Plaintiff, and causation of Plaintiff's injuries arising out of this accident. [Expert Name] will also comment upon the reasonableness and necessity of Plaintiff's treatments and future care.

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1 7. [Expert Name] is sufficiently familiar with the pending action to submit to
2 meaningful oral depositions concerning the testimony described above, including his expert
3 opinions and the basis therefor.

4 8. [Expert Name] has not produced any discoverable reports at this time.

5 9. [Expert Name]'s fees per hour are [\$] for deposition testimony and [\$] for
6 trial testimony.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct.

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10 Executed on May 23, 2018 at Los Angeles, California.

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By: _____
Daniel E. Selarz, Esq.

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PROOF OF SERVICE
Case No. [REDACTED]

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I, the undersigned, declare as follows:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years, and not a party to the within action. I am an employee of, or agent for, SELARZ LAW CORP., whose business address is 11777 San Vicente Blvd., Suite 702, Los Angeles, CA 90049.

On May 23, 2018 I served the foregoing document(s) **PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES (C.C.P. 2034 et seq.); DECLARATION OF DANIEL E. SELARZ, ESQ.; EXHIBITS** to the following party(ies) in this action addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

- (BY MAIL) I caused a true copy of each document, placed in a sealed envelope with postage fully paid, to be placed in the United States mail at Los Angeles, California. I am "readily familiar" with this firm's business practice for collection and processing of mail, that in the ordinary course of business said document(s) would be deposited with the U.S. Postal Service on that same day. I understand that the service shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.
- (BY PERSONAL SERVICE) I caused to be delivered each such document by hand to each addressee above.
- (BY CERTIFIED MAIL – CCP §§1020, et seq.) I caused said document(s) to be deposited with the United States Mail, postage prepaid, return receipt requested, signed by addressee that said documents were received.
- (BY OVERNIGHT DELIVERY) I caused a true copy of each document, placed in a sealed envelope with delivery fees provided for, to be deposited in a box regularly maintained by **United Parcel Service®(UPS)**. I am readily familiar with this firm's practice for collection and processing of documents for overnight delivery and know that in the ordinary course of business practice the document(s) described above will be deposited in a box or other facility regularly maintained by UPS or delivered to a courier or driver authorized by UPS to receive documents on the same date it is placed for collection.
- (BY FACSIMILE) By use of facsimile machine number (310) 651-8681, I served a copy of the within document(s) on the above interested parties at the facsimile numbers listed above. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine.
- (BY ELECTRONIC SERVICE) Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at their electronic notification addresses. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on May 23, 2018, in Los Angeles, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Daniel E. Selarz

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SERVICE LIST

SENT VIA U.S. MAIL

[Attorney's Name]
[Law Firm Name]
[Street Address]
[City, State & Zip Code]

Tel: (xxx) xxx-xxxx / Fax: (xxx) xxx-xxxx
Email: [Email Address]

[Attorneys for Defendant [DEFENDANT'S NAME]]