

RESPONSE TO DEMAND FOR EXCHANGE OF EXPERT WITNESSES

Sample Only
Use At Your Own Risk



I, _____ [attorney for party designating expert], declare:

1. I am an attorney licensed to practice law in California. I am the attorney of record for _____ [designating party], the _____ [plaintiff or defendant] in the above cause of action.

2. I make this declaration pursuant to section 2034(f)(2) of the Code of Civil Procedure. On behalf of _____ [designating party], I submitted a list of expert witnesses on whom I expect to rely at trial pursuant to section 2034(f) of the Code of Civil Procedure.

3. The list includes _____ [name of expert], who is _____ [a party or an employee of a party or an expert retained in preparation for trial or an expert retained to form and express opinions in anticipation of litigation] as described in section 2034(a)(2) of the Code of Civil Procedure.

4. _____ [Expert's] qualifications are as follows: _____ [briefly list expert's qualifications].

5. _____ [Expert] is expected to testify that _____ [briefly summarize substance of expected testimony from expert].

6. _____ [Expert] has agreed to testify at the trial of this action.

7. _____ [Expert] will be sufficiently familiar with his action to permit other parties to depose _____ [expert] in a meaningful way concerning the testimony _____ [he or she] is expected to give at trial.

8. _____ [Expert's] customary hourly fee for providing deposition testimony is

\$_____. _____ [Expert's] customary daily fee for providing deposition testimony is \$ _____.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was signed at _____, California.

Date: _____
_____ [Name]
Plaintiff *In Pro Per*

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