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Attorneys for Defendant  
VOLKSWAGEN GROUP OF AMERICA, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

MICHAEL K. NASSAR,

Plaintiff,

v.

VOLKSWAGEN GROUP OF AMERICA,  
INC., a New Jersey Corporation, and DOES 1  
Through 10, inclusive,

Defendants.

Case No. 18STCV10160

**DEFENDANT VOLKSWAGEN GROUP  
OF AMERICA, INC.'S DEMAND FOR  
EXCHANGE OF EXPERT WITNESS  
INFORMATION**

Action Filed: December 31, 2018  
FAC Filed: July 12, 2019

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendant VOLKSWAGEN GROUP OF AMERICA, INC. hereby demands under Code  
of Civil Procedure Section 2034.210-240 that on April 27, 2020, all parties to this action mutually  
and simultaneously exchange information concerning each party's expert trial witness(es), in  
writing, as required by Code of Civil Procedure Section 2034.260, as follows:

1. A written list containing the name and address of each natural person, including  
any party, whose oral or deposition testimony in the form of an expert opinion the responding  
party expects to offer in evidence at the trial, or, in the alternative, a statement that the responding  
party does not presently intend to offer the testimony of any expert witness.

2. If any witness on the list to be exchanged is an employee of the responding party,  
or has been retained by that party for the purpose of forming and expressing an opinion in

1 anticipation of the litigation or in preparation for the trial of the action, the designation of that  
2 witness shall include or be accompanied by a declaration that comports with the requirements of  
3 Code of Civil Procedure section 2034.260.  
4

5 Dated: March 30, 2020

Squire Patton Boggs (US) LLP

6  
7 By: 

8 Sean P. Conboy  
9 Shaun Kim

10 Attorneys for Defendant  
11 VOLKSWAGEN GROUP OF AMERICA, INC.  
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Re: Michael K. Nassar V. Volkswagen Group Of America, Inc., et al.  
Los Angeles County Superior Court Case Number: 18STCV10160

**PROOF OF SERVICE**

The undersigned certifies and declares as follows:

I am a resident of the State of California and over 18 years of age and am not a party to this action. My business address is 555 South Flower Street, 31st Floor, Los Angeles, California 90071.

On March 30, 2020, a copy of the following document(s):

**DEFENDANT VOLKSWAGEN GROUP OF AMERICA, INC.'S DEMAND FOR EXCHANGE OF EXPERT WITNESS INFORMATION**

was served on:

KNIGHT LAW GROUP, LLP  
Steve Mikhov, Bar No. 224676

Attorney for Plaintiffs  
**MICHAEL K. NASSAR**

stevenm@knightlaw.com  
Amy Morse, Bar No. 290502  
amorse@knightlaw.com  
10250 Constellation Blvd., Suite 2500  
Los Angeles, CA 90067  
Phone: 310-552-2250  
Fax: 310-552-7973

Service was accomplished as follows.



**By U.S. Mail, According to Normal Business Practices.** On the above date, at my place of business at the above address, I sealed the above document(s) in an envelope addressed to the above, and I placed that sealed envelope for collection and mailing following ordinary business practices, for deposit with the U.S. Postal Service. I am readily familiar with the business practice at my place of business for the collection and processing of correspondence for mailing with the U.S. Postal Service. Correspondence so collected and processed is deposited the U.S. Postal Service the same day in the ordinary course of business, postage fully prepaid.

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

Executed on March 30, 2020, at Los Angeles, California.



Shelia Sanders  
120779.00002

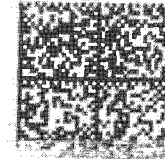
**SQUIRE**  
**PATTON BOGGS**

555 South Flower Street, 31st Floor  
Los Angeles, CA 90071

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APR 02 2020

**KNIGHT LAW GROUP, LLP**  
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