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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