

IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT IN AND  
FOR MARION COUNTY, FLORIDA

CASE NO. 2013-1308 CA

ELIEZER SOTO MALDONADO,  
SR., ELIEZER SOTO MALDONADO,  
SR. as the Duly appointed Florida  
Representative of the Estate of  
DEBORAH E. MALDONADO, Decedent,  
ELIEZER SOTO MALDONADO, SR.  
as the Duly appointed Florida  
Representative of the Estate of ELIEZER  
SOTO MALDONADO, JR., Decedent, and  
ELIEZER SOTO MALDONADO, SR.,  
as the Next Friend of ANA DELIZ  
MALDONADO, A Minor,

Plaintiffs,

vs

THEORPHILUS CLARK, PEOPLEASE  
CORPORATION, a South Carolina Foreign  
Corporation, and WAYNE T. FELLOWS,  
INC., a Florida Corporation,

Defendants.

**PLAINTIFFS' RETAINED EXPERT WITNESS DISCLOSURE**

**COME NOW** the Plaintiffs, by and through undersigned counsel, and pursuant to this Court's Order Scheduling Pretrial Conference and Jury Trial dated March 4, 2016, hereby discloses that Plaintiffs may call the following to provide expert opinions formulated specifically for this litigation:

1. Harold R. Linde, PsyD  
13701 Bruce B. Downs Blvd, Suite 103  
Tampa, FL 33613-4647

Curriculum Vitae attached

Dr. Linde is a licensed Clinical, Forensic and Rehabilitation Psychologist.

It is anticipated that Dr. Linde will testify regarding the mental pain and mental suffering Eliezer Maldonado, Sr. and Anadeliz Maldonado have suffered in the past and will continue to suffer in the future as a result of the tractor trailer collision with their family's vehicle and the resulting deaths of their wife and mother, Deborah Maldonado, and son and brother, Eliezer Maldonado, Jr.

Dr. Linde will testify regarding Mr. Maldonado's loss of his wife's companionship and support as well as the emotional distress he has suffered in the past and will suffer in the future as a result of witnessing the wrongful deaths of his wife and son.

Dr. Linde will testify regarding Anadeliz Maldonado's loss of the parental companionship, instruction and guidance of her mother as well as the emotional distress she has suffered in the past and will suffer in the future as a result of witnessing the wrongful deaths of her mother and brother

Dr. Linde will testify as to his review of evidence in this case, including but not limited to, Florida Traffic Crash Report, Homicide Reports, photographs of the scene, photographs of property damage and deposition testimony and offer expert opinions as to his evaluation and examination of Eliezer Maldonado, Sr. and Anadeliz Maldonado and the damages sustained in the past and in the future as a result of the incident that is the basis of this lawsuit.

2. Stefanos N. Kales, MD, MPH, FACP, FACOEM Curriculum Vitae attached  
1493 Cambridge St  
Cambridge, MA 02139

Dr. Kales is a Doctor of Medicine.

It is anticipated that Dr. Kales will testify regarding his review of evidence in this case offer expert opinions as fatigue, including but not limited to, contributing factors and the medical and physiological effects thereof.

3. John C. Glennon, Jr. Curriculum Vitae attached  
Crash Forensics  
9040 Parkhill  
Lenexa, KS 66215

Mr. Glennon is a Forensic Automotive Technologist specializing in the analysis and reconstruction of motor-vehicle crashes and has specialized knowledge in on-highway large truck crashes.

It is anticipated that Mr. Glennon will testify regarding his review of evidence in this case, including but not limited to, inspections and photographs of evidence and scene, Florida Traffic Crash Report, Homicide Reports, photographs of the scene,

photographs of property damage and deposition testimony and offer expert opinions as to crash reconstruction and the safe operation of heavy trucks.

3. Lew Grill Curriculum Vitae attached  
The Legacy Corporation  
3311 Ben Hogan Lane  
Billings, MT 59106

Mr. Grill is a trucking industry expert.

It is anticipated that Mr. Grill will testify regarding his review of evidence in this case, including but not limited to, Florida Traffic Crash Report, Homicide Reports, photographs of the scene, photographs of property damage and deposition testimony and offer expert opinions as to the safe operation of commercial motor vehicles and the standard of care of commercial motor vehicle operations, commercial motor carriers and employers of commercial motor vehicle operators.

4. Brooks Rugemer Curriculum Vitae attached  
Robson Forensic  
354 North Prince Street  
Lancaster, PA 17603

Mr. Rugemer is a trucking industry expert.

It is anticipated that Mr. Rugemer will testify regarding his review of evidence in this case, including but not limited to, Florida Traffic Crash Report, Homicide Reports, photographs of the scene, photographs of property damage and deposition testimony and offer expert opinions as to the safe operation of commercial motor vehicles and the standard of care of commercial motor vehicle operations, commercial motor carriers and employers of commercial motor vehicle operators.

5. Nadia Webb, PsyD, MP Curriculum Vitae attached  
1492 Middlebrook Rd  
Staunton, VA 24401

Dr. Webb is a Board Certified Pediatric Neuropsychologist, Board Certified Neuropsychologist, Clinical Psychologist and Medical Prescribing Psychologist.

It is anticipated that Dr. Webb will testify as to her review of evidence in this case, including but not limited to, Florida Traffic Crash Report, Homicide Reports, photographs of the scene, photographs of property damage and deposition testimony and offer opinions as to her evaluation and examination of Anadeliz Maldonado and the damages suffered by Anadeliz Maldonado in the past and in the future as a result of the incident that is the basis of the lawsuit.

6. Robert Johnson Curriculum Vitae attached  
Robert W. Johnson & Associates  
4984 El Camino Real, Suite 210  
Los Altos, CA 94022

Mr. Johnson is an Economist.

It is anticipated that Mr. Johnson will testify as to his opinions regarding the determination and calculation of the Plaintiffs' damages.

7. Ben Levitan Curriculum Vitae attached  
4317 Worley Dr  
Raleigh, NC 27613

Mr. Levitan is a Cellular, Telephony and Wireless Consultant and Author

It is anticipated that Mr. Levitan will testify as to his review of the cell phone records of Eliezer Maldonado, Sr. and Theophilus Clark.

8. Sarah Lustig, BSN, RN, CLCP, CNLCP Curriculum Vitae attached  
Lustig Consulting, LLC

Ms. Lustig is a Certified Life Care Planner.

It is anticipated that Ms. Lustig will testify as to the Plaintiffs' life care.

9. Any and all expert witnesses listed by the Defendants.  
10. Any rebuttal and/or impeachment experts as necessary in response to Defendants' experts' testimony.  
11. Plaintiffs reserve the right to amend and/or supplement this witness list with sufficient notice to Defendants so as not to prejudice either party

#### **CERTIFICATE OF SERVICE**

The undersigned certifies on this 1<sup>st</sup> day of April, 2016, the foregoing was electronically filed with the Clerk of Marion County by using the Florida Courts E-Filing Portal and E-mailed to Daniel.Kissane@csklegal.com; Ryan.Williams@csklegal.com; Theresa.Tippins@csklegal.com and Pauletta.Hembling@csklegal.com, attorneys for Defendants, Theophilus Clark, Peoplease and Wayne T. Fellows, Inc. and Lanessa Riobe, DC#156466, Lowell Correctional Institution, 11120 NW Gainesville Rd, Ocala, FL 34482.

/s/ Marianne Howanitz, Esquire  
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