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**IN THE THIRD JUDICIAL DISTRICT COURT
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

<p>JUDITH PINBOROUGH ZIMMERMAN, Ph. D.,</p> <p>Plaintiff,</p> <p>vs.</p> <p>THE UNIVERSITY OF UTAH,</p> <p>Defendant.</p>	<p>PLAINTIFF'S DISCLOSURE OF EXPERT TESTIMONY</p> <p>Case No. 170907259 CE</p> <p>Judge Patrick Corum</p>
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Plaintiff Judith Pinborough Zimmerman, Ph.D. ("Dr. Zimmerman"), by and through her attorneys, hereby provides the information required by Rule 26 (a)(4) of the Utah Rules of Civil Procedure regarding her expert.

1. Dr. Zimmerman has hired Sylvia Kessler, a forensic document examiner, to examine the authenticity of the signature of Barry Nangle on the Utah Department of Health Data Sharing Agreement produced as ZIMMER PRD 91-95 by the University of Utah in the federal case (Utah Federal District Court, case No: 2:13-cv-01131-JNP). Ms. Kessler's CV is attached as Exhibit A, and a list of cases she has testified as an expert in during the last four years is attached as Exhibit B.

2. University witnesses have relied on the Data Sharing Agreement as a basis for sharing identifiable data, and retaliated against Dr. Zimmerman when she reported that the data was shared illegally, as proven in the federal case. The University was unable to produce during discovery in this case an original of ZIMMER PRD 91-95, or any communications involving the document, causing concerns about its authenticity. Therefore, Dr. Zimmerman hired Ms. Kessler to examine whether Barry Nangle's signature on the document was authentic. Ms. Kessler is expected to testify that the signature of Barry Nangle on the Data Sharing Agreement is not authentic, as discussed in the report attached as Exhibit C. Furthermore, she is expected to testify that during the course of her examination of ZIMMER PRD 91-95, which involved examining other documents containing Barry Nangle's signature, she determined that many of the other signatures on the sample signature documents contained signatures that are not authentic. The forged signatures include, for instance, the signatures of Vivian Lee and Thomas Parks for the University of Utah and Barry Nangle's signature for the Utah Department of Health on various agreements regarding data sharing between the entities, included as Exhibit 2 to Ms. Kessler's report.
3. Ms. Kessler relied on multiple signatures provided by Dr. Zimmerman for her examination, which are compiled in a single document and attached hereto as Exhibit D. The questioned signature, referred to as "Q1" in this report, was produced in the federal litigation as ZIMMER PRD 91-95. Dr. Zimmerman will produce the entire documents reviewed by Ms. Kessler containing Barry Nangle's signature as bates labeled documents.
4. Ms. Kessler charges \$200/hour for study and examination and \$250/hour for

deposition or court testimony (with a minimum of four hours). Dr. Zimmerman has thus far paid her \$2,245.

Dated this 4th day of June, 2020.

HOLLINGSWORTH LAW OFFICE, LLC
/s/ April L. Hollingsworth
April L. Hollingsworth
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of **PLAINTIFF'S DISCLOSURE OF EXPERT TESTIMONY** has been served via electronic mail, on this 4th day of June, 2020, to the following:

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