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17 Attorneys for Plaintiffs

18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA

20 THOMAS S. TAORMINA, et al.,)
21)
22 Plaintiffs,) 3:11-CV-00645-RCJ-VPC
23 vs.)
24)
25 STOREY COUNTY, NEVADA,)
26)
27 Defendants.)
28)

29 **EXPERT DISCLOSURE; FRCP RULE 26**

30 COME NOW Plaintiffs, by and through their attorneys, McMahon Law Offices, Ltd., and
31 hereby discloses the following expert:

- 32 1. Thomas S. Taormina, c/o McMahon Law Offices, Ltd., 3715 Lakeside Drive,

1 Suite A, Reno, Nevada 89509.

2 In an abundance of caution and the broadest interpretation of FRCP 26, Mr. Taormina is
3 hereby designated as a witness who has specific information and knowledge relating to the
4 difference and necessity of the radio antennae towers as well as his professional backgrounds.
5 Taormina is a veteran HAM amateur radio operator and will explain frequency and tower
6 relations.
7

8 It is anticipated that Mr. Taormina will form opinions surrounding industry standards,
9 compliance with industry standards and design of towers as utilized in amateur radio and
10 emergency applications.
11

12 Further, whether by lay opinion, percipient or otherwise, it is anticipated that MR.
13 Taormina will form opinions regarding the designing and building of all radio antennae and the
14 necessity of each tower.
15

16 2. Plaintiffs reserve the right to call as a witness any expert designated by any other
17 party.

18 Dated: January 18, 2012.

19
20 McMAHON LAW OFFICES, LTD.

21 FRED HOPENGARTEN, Esq.

22 //s// Brian M. McMahon

23 By _____
24 Brian M. McMahon
25 Attorneys for Plaintiffs
26 Thomas S. Taormina and
27 Midge A. Taormina
28

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b) I hereby certify that I am an employee of McMahon Law Offices, Ltd., and that on the 23RD day of February, 2012, I served a true and correct copy of the attached foregoing document by:

- Depositing for mailing, in a sealed enveloped, U.S. Postage prepaid, at Reno, Nevada
- Personal Delivery
- Facsimile
- Federal Express/Airborne Express/Other Overnight Delivery
- Reno-Carson Messenger Service

addressed as follows:

Brent T. Kolvet, Esq.
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///ss/// Jennifer Hall

Jennifer Hall, Paralegal