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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 07-60534-CIV-DIMITROULEAS  
MAGISTRATE JUDGE: ROBIN ROSENBAUM

HOWARD K. STERN,

Plaintiff,

vs.

JOHN O'QUINN,

Defendant.

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**DEFENDANT JOHN O'QUINN'S RULE 26 DISCLOSURES**

Defendant, JOHN O'QUINN, by and through his undersigned counsel, pursuant to Rule 26, Fed.R.Civ.P., Local Rule 26.1(a) hereby makes the following initial disclosures based on information known to the Defendant and his attorneys at the time of this disclosure:

**(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

John O'Quinn is currently aware of the following individuals who are likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings.

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STEPHENS LYNN KLEIN  
LA CAVA HOFFMAN & PUYA, P.A.

1. **Howard K. Stern**  
c/o L. Lin Wood  
Powell Goldstein LLP  
One Atlantic Center  
Fourteenth Floor  
1201 West Peachtree Street, N.W.  
Atlanta, GA 30309  
(404) 572-6600  
Subject: Statements made by Mr. O'Quinn
  
2. **John O'Quinn**  
c/o Robert M. Klein  
Stephens, Lynn, Klein,  
LaCava, Hoffman & Puya, P.A.  
9130 S. Dadeland Blvd.  
Datran Two, Penthouse II  
Miami FL 33156  
(305) 670-2700  
Subject: Statements made by Mr. O'Quinn
  
3. **Virgie Authur**  
Address withheld for privacy reasons  
Telephone: Withheld for privacy reasons  
Subject: Statements made by Mr. O'Quinn
  
4. **Larry Birkhead**  
Address withheld for privacy reasons  
Telephone: Withheld for privacy reasons  
Subject: Statements made by Mr. O'Quinn
  
5. **Maurice Brighthaupt**  
Address withheld for privacy reasons  
Telephone: To be obtained and provided  
Subject: Circumstances surrounding death of Anna Nicole
  
6. **Tasma Brighthaupt**  
Address withheld for privacy reasons  
Telephone: To be obtained and provided  
Subject: Circumstances surrounding death of Anna Nicole
  
7. **Nathaniel Collins**  
Address to be determined and provided  
Telephone: To be Determined  
Subject: Relationship between Anna Nicole Smith and Stern

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8. **Rita Cosby**  
Address: New York, New York  
Telephone: Unknown  
Subject: Interview of February 19, 2007
9. **Dr. Kristine Eroshevich**  
Address: Encino, California  
Telephone: To be determined and provided  
Subject: Medications prescribed to Anna Nicole Smith
10. **Eric Gibson**  
Address: Nassau, Bahamas  
Telephone: Withheld for privacy reason  
Subject: Relationship between Anna Nicole Smith and Stern
11. **Gerlene Gibson**  
Address: Nassau, Bahamas  
Telephone: Withheld for privacy reason  
Subject: Relationship between Anna Nicole Smith and Stern
12. **Nancy Grace**  
Address: New York, New York  
Telephone: Unknown  
Subject: Interviews with CNN
13. **Sandeep Kapoor**  
Address: California  
Telephone: Unknown  
Subject: Medications prescribed to Anna Nicole Smith
14. **Brigitte Neven**  
Address: Nassau, Bahamas  
Telephone: To be determined  
Subject: Circumstances surrounding death of Anna Nicole
15. **Eric Redding**  
Address: Texas  
Telephone: To be determined and provided  
Subject: Relationship between Anna Nicole Smith and Stern
16. **Juan Rivera**  
Address: To be determined and provided  
Telephone: To be determined and provided  
Subject: Response to emergency call at the Hard Rock Hotel and Casino concerning Anna Nicole Smith

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17. **Sandy Serrano**  
Address: To be determined and provided  
Telephone: Withheld for privacy reason  
Subject: Relationship between Anna Nicole Smith and Stern
  
18. **Greta Van Susteren**  
Address: New York, New York  
Telephone: Unknown  
Subject: Various interviews with Fox News
  
19. **Kim Walther**  
Address: To be determined and provided to Defendant  
Telephone: To be determined  
Subject: Relationship between Anna Nicole Smith and Stern
  
20. **Nadine Alexis**  
Address: Nassau, Bahamas  
Telephone: To be determined  
Subject: Relationship between Anna Nicole Smith and Stern
  
21. **Joshua Perper**  
Address: Chief Medical Examiner  
Broward County Medical Examiner's Office  
5301 S.W. 31<sup>st</sup> Avenue  
Ft. Lauderdale, FL 33312  
Telephone: (954) 327-6520  
Subject: Cause of Death
  
22. **Queetlie Alexis**  
Address: Nassau, Bahamas  
Telephone: To be determined  
Subject: Relationship between Anna Nicole Smith and Stern
  
23. **Gaither Ben Thompson**  
Address: Myrtle Beach, South Carolina  
Telephone: To be determined  
Subject: Relationship between Anna Nicole Smith and Stern
  
24. **Stancil Ford Shelley**  
Address: Myrtle Beach, South Carolina  
Telephone: To be determined  
Subject: Anna Nicole Smith

25. **Gina Shelley**  
Address: Myrtle Beach, South Carolina  
Telephone: To be determined  
Subject: Anna Nicole Smith
  
26. **Peter Nygard**  
Address: Lyford Cay a/k/a Nygard Cay, Bahamas  
Telephone: To be determined  
Subject: Relationship between Anna Nicole Smith and Stern
  
27. **Garlene Gibson**  
Address: Bahamas  
Telephone: To be determined  
Subject: Relationship between Anna Nicole Smith and Stern
  
28. **Alexander Denk**  
Address: To be determined and provided  
Telephone: To be determined  
Subject: Relationship between Anna Nicole Smith and Stern
  
29. **Harold Schueler**  
Address: Medical Examiner & Trauma Services  
5301 S.W. 31<sup>st</sup> Avenue  
Ft. Lauderdale FL 33312  
Telephone: (954) 964-0500  
Subject: Cause of Death
  
30. **Alex Katz**  
Address: To be determined and provided  
Telephone: To be determined  
Subject: Cause of Death
  
31. **Jack Harding**  
Address: To be determined and provided  
Telephone: To be determined  
Subject: Relationship between Anna Nicole Smith and Stern
  
32. **Mark Speer**  
Address: To be determined and provided  
Telephone: To be determined  
Subject: Relationship between Anna Nicole Smith and Stern
  
33. **Ray Martino**  
Address: To be determined and provided  
Telephone: To be determined  
Subject: Relationship between Smith and Stern

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34. **Duane Sands, M.D.**  
Address: Bahamas  
Telephone: To be determined  
Subject: Cause of Death
  
35. **Timothy Barets, M.D.**  
Address: To be determined and provided  
Telephone: To be determined  
Subject: Cause of Death
  
36. **Ned Bruck**  
Address: Real Deal Yachts  
Fontainebleau Resort Miami Beach  
4441 Collins Avenue  
Miami Beach, FL 33140  
Toll-free: 877-283-4740  
Telephone: 305-538-2022  
Subject: Cause of Death
  
37. **Mark Dekema**  
Address: Real Deal Yachts  
Fontainebleau Resort Miami Beach  
4441 Collins Avenue  
Miami Beach, FL 33140  
Toll-free: 877-283-4740  
Telephone: 305-538-2022  
Subject: Cause of Death
  
38. **Detective Marian Bryant**  
Seminole Police Department  
6300 Stirling Road  
Hollywood FL 33024  
Telephone: (800) 683-7800  
Subject: Cause of Death
  
39. **Dr. Gertrude M. Juste**  
Broward County Medical Examiner's Office  
5301 S.W. 31<sup>st</sup> Avenue  
Ft. Lauderdale, FL 33312  
Telephone: (954) 327-6520  
Subject: Cause of Death
  
40. This Defendant reserves the right to supplement and/or amend his initial disclosure response.

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**(B) A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claim or defenses, unless solely for impeachment.**

1. All documents referred to in the Complaint
2. Documents relating to the investigation into the death of Anna Nicole Smith.
3. Documents relating to the investigation into the death of Daniel Smith.
4. Any and all documents introduced during the deposition of John O'Quinn.
5. Deposition transcript of John O'Quinn taken on or about August 16, 2007.
6. This Defendant reserves the right to supplement and/or amend this disclosure response.

**(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of the injuries suffered.**

N/A

**(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be**

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**entered in the action or to indemnify or reimburse for payments made to satisfy the judgments.**

John M. O'Quinn & Associates LLP  
Lloyds, Policy No. 146/LDUSA0600866

A copy of the policy is available for inspection and/or copying.

WE HEREBY CERTIFY that on September 26, 2007, this document was e-filed using the CMECF system and that a true and correct copy was served via e-mail to: **L. LIN WOOD, ESQ.**, ([llwood@pogolaw.com](mailto:llwood@pogolaw.com)) Powell Goldstein LLP, *Co-counsel for Plaintiff*, One Atlantic Center, 14<sup>th</sup> Floor, 1201 W. Peachtree Street, N.W., Atlanta, GA 30309; and **M. KRISTA BARTH, ESQ.** ([krista@emsattorneys.com](mailto:krista@emsattorneys.com)), Eric M. Sauerberg, P.A., *Co-counsel for Plaintiff*, Suite 102, 200 Village Square, Palm Beach Gardens, FL 33410 **NEIL McCABE, ESQ.**, ([neilm@oqlaw.com](mailto:neilm@oqlaw.com)) The O'Quinn Law Firm, 440 Louisiana, Suite 2300, Houston, TX 77002 who are listed as recipients as counsel under said system.

STEPHENS LYNN KLEIN LA CAVA  
HOFFMAN & PUYA, P.A.

**Counsel for Defendant**

9130 S. Dadeland Blvd., PH-II  
Two Datran Center  
Miami, FL 33156

**Tele: 305/670-3700**

**Fax : 305/670-8592**

**E-Mail: [kleinr@stephenslynn.com](mailto:kleinr@stephenslynn.com)**

By: S/ROBERT M. KLEIN

ROBERT M. KLEIN

Florida Bar No. 230022

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