

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF \_\_\_\_\_

----- X

[NAME],

Plaintiff,

-against-

[NAME],

Defendant.

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S I R S :

**PLEASE TAKE NOTICE** that pursuant to CPLR Section 3101(d), you are hereby required, as a continuing demand, to identify to the undersigned each person whom the defendant expects to call as an expert witness at the trial of this action and to disclose in reasonable detail the subject matter on which each expert is expected to testify, the substance of the facts and opinions on which each expert is expected to testify, the qualifications of each expert witness and a summary of the grounds of each experts' opinion, together with a copy of all reports containing all or part of the above information.

And in default of your supplying the above information on a timely basis prior to the testimony of the expert witness, the defendant will move to preclude the witness from giving testimony, in addition to all other sanctions and remedies available under the circumstances.

Dated: \_\_\_\_\_, New York

\_\_\_\_\_, 20\_\_\_\_

Name of Firm

By: \_\_\_\_\_

Name of Attorney

Attorneys for Plaintiff  
Office and P.O. Address  
Telephone Number

TO: Name of Opposing Counsel  
Attorneys for Defendant  
Office and P.O. Address