

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 06-CR-30098-DRH
)
AJIT TRIKHA)
Defendant.)

**REQUEST AND MOTION OF AJIT TRIKHA FOR
DISCLOSURE OF EXPERT TESTIMONY**

Comes now Ajit Trikha, by his attorney, John D. Stobbs II, and for his Request and Motion for Disclosure of Expert Testimony, states:

1. At the outset, Defendant acknowledges that the Government has already provided the name of one expert it intends to use, Dr. Richard Baer. The Government has provided Dr. Baer’s curriculum vitae and indicated that he will “testify to the use of codes used to bill Medicare for psychiatric services and will testify generally about the practice of psychiatry.”

2. This disclosure, while helpful, does not allow Defendant to adequately prepare a proper Motion in Limine or *Daubert* Motion to challenge Dr. Baer’s conclusions.

3. As such, Defendant requests entry of an Order requiring the Government to disclose a summary of testimony that it intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case in chief at trial along with the witnesses’ opinions, the basis and reasons for those opinions, and the witnesses’ qualifications.

4. Rule 16 (E) provides that the Government shall make the foregoing disclosure upon request of the Defendant. Failure to make a specific request has been held to be a waiver of this requirement.

WHEREFORE, Defendant respectfully requests that the relief sought herein should be granted.

AJIT TRIKHA

STOBBS LAW OFFICES

BY:

/s/ John D. Stobbs, II

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CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2007 a copy of the attached *Request and Motion of Ajit Trikha For Disclosure of Expert Testimony* was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Mr. Michael Quinley
Assistant U.S. Attorney
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