

December 17, 2014

2424 S.E. Bristol Street, Suite 300  
Newport Beach, CA 92660-0764  
TEL 949-852-1800  
FAX 949-852-8510  
cw@cwlawyers.com

**VIA E-MAIL**  
mfalkenhagen@hsno.com

Mark O. Falkenhagen  
HSNO  
617 West 7th St., Suite 605  
Los Angeles, CA 90017

Expert Witness Qualifications

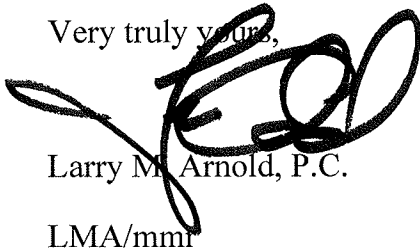
Dear Mark:

Thanks again for the party. My suggestion for a couple of paragraphs pertaining to what I am looking for in an expert witness is as follows:

The first two things I look for in an expert witness are qualifications and truthfulness. I want to make sure that any expert witness I hire on behalf of my clients is fully qualified to express opinions on the subjects that are crucial to the claim or litigation. I have found too often that experts in one field try to act as experts in a related field without the appropriate qualifications, which leads to a bad result for the clients. An expert should not try to stretch their abilities but rather focus on those areas in which they truly have expertise.

As important as qualifications, is truthfulness. I want an expert witness always to tell the truth whether I like the answer or not. I have found too often that experts tell me what it is they think I want to hear rather than what they actually believe. When this occurs, and the expert is confronted by the adverse attorney, it becomes fairly obvious that they are attempting to tell a story that will support the position of the party who has hired them rather than expressing their own true independent opinion.

Very truly yours,



Larry M. Arnold, P.C.  
LMA/mmr