

# Exhibit 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: WATTS COORDINATED  
PRETRIAL PROCEEDINGS

)  
) Master Docket Case No. 19-cv-01717  
)  
) Judge Franklin U. Valderrama  
)  
) Magistrate Judge Sheila M. Finnegan  
)

THIS DOCUMENT RELATES TO CASE NO. 16-CV-8940

**PLAINTIFFS BEN BAKER'S AND CLARISSA GLENN'S  
FEDERAL RULE OF CIVIL PROCEDURE 26(a)(2) DISCLOSURES**

Plaintiffs Ben Baker and Clarissa Glen, by and through their counsel, provide the following disclosures according to Federal Rule of Civil Procedure 26(a)(2):

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(B), Plaintiffs disclose the following individuals:

1. **Jon Shane, Ph.D.** – Dr. Shane may be called to present evidence at trial pursuant to Rules 702, 703, or 705 of the Federal Rules of Evidence and is expected to testify regarding the subject matter discussed in the report produced in this case, as well as any deposition conducted. The report includes a statement regarding his compensation as well as a list of cases in which he has testified as an expert at trial or by deposition in the past 4 years, attached hereto.

2. **Allison D. Redlich, Ph.D.** – Dr. Redlich may be called to present evidence at trial pursuant to Rules 702, 703, or 705 of the Federal Rules of Evidence and is expected to testify on the subject matter discussed in the report produced in this case, as well as any deposition conducted. The report includes a statement regarding her compensation as well as a list of cases in which she has testified as an expert at trial or by deposition in the past 4 years, attached hereto.

3. **Jeffrey Danick** – Mr. Danick may be called to present evidence at trial pursuant to Rules 702, 703, or 705 of the Federal Rules of Evidence and is expected to testify on the subject matter discussed in the report produced in this case, as well as any deposition conducted. The report includes a statement regarding his compensation as well as a list of cases in which he has testified as an expert at trial or by deposition in the past 4 years, attached hereto.

4. **Alicia McCarthy, Ph.D.** – Dr. McCarthy may be called to present evidence at trial pursuant to Rules 702, 703, or 705 of the Federal Rules of Evidence and is expected to testify regarding the subject matter discussed in the report produced in this case, as well as any deposition conducted. The report includes a statement regarding her compensation as well as a list of cases in which she has testified as an expert at trial or by deposition in the past 4 years, attached hereto. Dr. McCarthy's qualifications are provided in the C.V. attached hereto.

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(C), Plaintiffs disclose the following individual:

5. **Shairee Lackey, LCSW** – This individual is Plaintiff Clarissa Glenn's therapist. Ms. Lackey is expected to testify concerning her clinical observations, diagnoses, and treatment of Ms. Glenn, including the diagnosis that Ms. Glenn suffers from PTSD as a result of the wrongdoing at issue in this case. Ms. Lackey is also expected to testify as to her education, training, and experience in counseling and mental health care. Ms. Lackey's testimony may include any opinions and facts contained in the records labeled as PL JOINT 087349-087354.

Respectfully submitted,

/s/Scott Rauscher  
*One of Plaintiffs' Attorneys*

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**CERTIFICATE OF SERVICE**

The undersigned, Scott Rauscher, hereby certifies that on April 1, 2024, a copy of the foregoing document was served on all counsel of record via electronic mail.

/s/Scott Rauscher