



Department of Defense, Department of Corrections, and all other defendants hereby designate expert witnesses on class certification issues:

1. Mark McCormick, LL.B., L.L.M.  
Belin Lamson McCormick Zumbach Flynn, a Professional Corporation  
666 Walnut Street, Suite 2000  
Des Moines, Iowa 50309

Mr. McCormick will testify about matters related to the lack of typicality and commonality as well as the appropriateness of certifying this case as a class action.

2. Gavin Cross, Ph.D.  
Associate Professor of Statistics, Department of Mathematics  
Coe College  
1220 First Avenue NE  
Cedar Rapids, Iowa 52402

Professor Cross will testify about statistics and statistical analyses at issue in this case, including statistical analyses of the Defendants' workforce data and employment policies and practices.

3. Michael Lee Sandberg, Ph.D.  
Professor of Finance Emeritus  
Coe College  
1220 First Avenue N.E.  
Cedar Rapids, Iowa 52402

Professor Sandberg will testify about statistical and workplace economic issues related to certification issues in this matter.

4. Connie Champnoise  
Project Director  
CPS Human Resource Services  
2923 Marketplace Drive, Suite 108  
Madison, Wisconsin 53719

Ms. Champnois will testify about public sector human resources—including recruitment, promotion, and selection—and about all matters related to CPS's review of the State of Iowa hiring practices.

5. William "Bill" West  
Public Service Executive IV  
Iowa Department of Administrative Services  
Human Resources Enterprise  
Hoover State Office Building  
Des Moines, Iowa 50319

As part of providing factual testimony, Mr. West may offer opinions that could be considered expert opinions. Consequently, he may offer expert opinion on matters related (1) to the State of Iowa's hiring and employment practices and systems, (2) to the State of Iowa's workforce and employment data, and (3) to the operation of the AS400, the Brass Ring, and HRIS systems.

6. Mary Ann Hills  
Public Service Executive IV  
Iowa Department of Administrative Services  
Human Resources Enterprise  
Hoover State Office Building  
Des Moines, Iowa 50319

As part of providing factual testimony, Ms. Hills may offer opinions that could be considered expert opinions. Consequently, she may offer expert opinion on matters related (1) to the State of Iowa's hiring and employment practices and systems, (2) to the State of Iowa's workforce and employment data, and (3) to the operation of the AS400, the Brass Ring, and HRIS systems.

7. Sharleen Newton  
Iowa Department of Administrative Services  
Human Resources Enterprise  
Hoover State Office Building  
Des Moines, Iowa 50319

As part of providing factual testimony, Ms. Newton may offer opinions that could be considered expert opinions. Consequently, she may offer expert opinion on matters related (1) to the State of Iowa's hiring and employment practices and systems, (2) to the State of Iowa's workforce and employment data, and (3) to the operation of the AS400, the Brass Ring, and HRIS systems.

8. Steve Carlson  
IT Administrator 3  
Iowa Department of Administrative Services  
Information Technology Enterprise  
Hoover State Office Building  
Des Moines, Iowa 50319

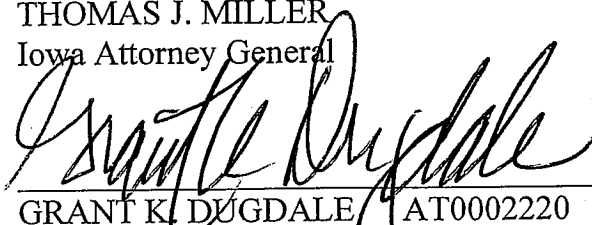
As part of providing factual testimony, Mr. Larson may offer opinions that could be considered expert opinions. Consequently, he may offer expert opinion on technology-related matters related to the AS400, the Brass Ring, and HRIS systems.

9. Defendants reserve the right to designate additional expert witnesses in accordance with the parties agreement to allow Defendants until July 24, 2008, to submit their designation of expert witnesses.

10. Defendants reserve the right to designate or call as their own witness any expert witness designated by the plaintiffs.

Respectfully submitted,

THOMAS J. MILLER  
Iowa Attorney General



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Assistant Attorney General

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing instrument was served upon each of the attorneys of record of all parties in the above-entitled cause at their respective addresses as disclosed by the pleadings on the 18<sup>th</sup> day of July, 2008, by:

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> U.S. Mail | <input type="checkbox"/> Electronic Mail |
| <input type="checkbox"/> Hand Delivery        | <input type="checkbox"/> Other: _____    |
| <input type="checkbox"/> Express Mail         |  |

Signature: \_\_\_\_\_

