

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JOHN B. PICCHI,	)	
	)	
Plaintiff,	)	
	)	Civil Action No.: 06 193 (KAJ)
v.	)	
	)	JURY TRIAL DEMANDED
SUMMIT NORTH MARINA, Inc.,	)	
	)	
Defendant.	)	

DEFENDANT'S INITIAL DISCLOSURES

1. A. Persons to likely have discoverable information

Darryl Baker c/o defendant;
Keith King, c/o defendant;
Janice Trala, 102 Fairmont Drive, Bear, Delaware, 19701

- B. Description of documents

Defendant has in its possession copies of a contract entered into between plaintiff defendant and a copy of a report prepared by Ocean Marine Specialist, Inc.

- C. Computation of any category of damages

See invoice from Summit North Marina and invoice of the Guardian Company dated 2/20/03.

- D. Insurance Agreement

Attached hereto is a copy of the Declaration Page for defendant's insurance carrier.

2. Disclosure of expert testimony

Defendant intends to call Jonathan Klipman and Daniel K. Rutherford, c/o Ocean Marine Specialties, Inc., 113 Stevens Street, West Cape May, NJ 08204. A copy of Ocean Marine Specialties Final Report is attached hereto.

A copy of the photographic log is attached hereto.

/s/ Stephen P.Casarino

STEPHEN P. CASARINO, ESQUIRE

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Attorney for the Defendant

Dated: October 24, 2006

