

**FIRST JUDICIAL DISTRICT COURT
COUNTY OF SANTA FE
STATE OF NEW MEXICO**

CAROLA KIEVE, M.D.,

Plaintiff,

v.

No. D 101-CV-2014-00140

**NEW MEXICO DEPARTMENT OF HEALTH AND
THE MEDICAL CANNABIS ADVISORY BOARD,**

Defendants.

EXPERT WITNESS LIST

COMES NOW the Defendant, New Mexico Department of Health (“Department”), and submits its Expert Witness List for potential expert testimony at trial in the above-captioned matter, stating as follows:

The Defendant Department of Health may call the following individuals to testify at trial in this matter:

- 1. Alfredo Vigil, M.D., former Cabinet Secretary of the New Mexico Department of Health.**

Dr. Vigil may be called to testify in an expert capacity regarding medical considerations underlying the adoption of the Department of Health’s Medical Cannabis Program regulations, including application submittal criteria for enrollment under Department-approved conditions; his knowledge (and past knowledge at the time of the adoption of Department regulations) of the treatment of PTSD and other medical conditions with cannabis; his knowledge (and past knowledge at the time of the adoption of Department regulations) of potential adverse reactions

and side-effects from cannabis usage by patients; his knowledge (and past knowledge at the time of the adoption of Department regulations) of medical literature regarding PTSD, and regarding the use of cannabis; his knowledge (and past knowledge at the time of the adoption of Department regulations) of prescription medicine; and other relevant matters.

2. Steven Rosenberg, M.D., Medical Director, New Mexico Department of Health Medical Cannabis Program.

Dr. Rosenberg may be called to testify in an expert capacity regarding medical considerations relevant to the application and enforcement of the Department of Health's Medical Cannabis Program regulations, including the application submittal criteria for enrollment under Department-approved conditions; his knowledge of the treatment of PTSD and other medical conditions with cannabis; his knowledge of potential adverse reactions and side-effects from cannabis usage by patients; his knowledge of prescription medicine; and other relevant matters.

3. Any witness called to testify by the Plaintiff; and
4. Any witness whose testimony is required for purposes of rebuttal.

Respectfully submitted,

/s/ Chris D. Woodward
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CERTIFICATE OF SERVICE

I certify that I caused the foregoing document to be served on the following persons via the New Mexico electronic filing system on this 5th day of September, 2014:

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/s/ Chris D. Woodward
Chris D. Woodward