

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY

MARY WEBB, individually, and in her
capacity as Administratrix of the
Estate of Robert A. Webb,

Plaintiffs,

v.

Civil Action No.: 5:09-CV-1253

RALEIGH COUNTY SHERIFF'S DEPARTMENT;
RALEIGH COUNTY COMMISSION; SHERIFF DANNY
MOORE, individually, and in his official capacity;
CHIEF DEPUTY STEVE TANNER, individually, and in
his official capacity; DEPUTY GREG S. KADE, individually,
and in his official capacity; and DEPUTY JOHN E. HAJASH,
individually, and in his official capacity

Defendants.

DEFENDANT DEPUTY JOHN HAJESH'S JOINDER IN MOTION BY CO-
DEFENDANTS TO EXCLUDE PLAINTIFF'S EXPERT WITNESS

COMES NOW defendant, Deputy John E. Hajash, by counsel, and moves
this Court to grant his Joinder in Motion By Co-defendants to exclude plaintiff's expert
witness. In support of his motion, defendant Deputy John Hajash states as follows:

On September 2, 2010 co-defendants, Raleigh County Sheriff's
Department, Raleigh County Commission, Sheriff Danny Moore, individually, and in
his official capacity, Chief Deputy Steve Tanner, individually and in his official
capacity, and Deputy Greg S. Kade, individually and in his official capacity, filed their
Motion to Exclude Plaintiff's Expert Witness. On September 23, 2010, those defendants
also filed their Reply to Plaintiff's Response in Opposition of those defendants' Motion
to Exclude Plaintiff's Expert Witness.

Defendant, Deputy John E. Hajash, specifically joins in the co-defendants
Motion to Exclude Plaintiff's Expert Witness, and adopts, as if set forth fully herein, all

of the arguments made by co-defendants in their Motion to Exclude Plaintiff's Expert Witness and the arguments set forth in the co-defendants' Reply to Plaintiff's Response in Opposition of those defendants' Motion to Exclude Plaintiff's Expert Witness.

WHEREFORE, Deputy John E. Hajash prays that this Court grant his Joinder in Motion by Co-defendants to Exclude Plaintiff's Expert Witness and such further relief as this Court deems just.

JOHN E. HAJASH,

By Counsel.

/s/ Timothy G. Hayes
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CERTIFICATE OF SERVICE

I, Timothy G. Hayes, attorney for defendant John E. Hajash, hereby certify that on the 24th day of September, 2010, I electronically filed the foregoing DEFENDANT DEPUTY JOHN HAJESH'S JOINDER IN MOTION BY CO-DEFENDANTS TO EXCLUDE PLAINTIFF'S EXPERT WITNESS with the Clerk of this Court using the CM/ECF system which will send notification of such filing to CM/ECF participants:

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(and)

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Danny Moore, Chief Deputy Steve Tanner,
Deputy Greg S. Kade.*

/s/ Timothy G. Hayes
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