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To Whom It May Concern:

In searching for an expert witness, I look for the following qualities:

1. Comprehensive knowledge of the area in which an expert is required;
2. Actual experience or research in the area;
3. Intellectual honesty;
4. Prior experience in providing expert reports, giving depositions, and in-court testimony; and
5. Accessibility and ease of communication.

I had occasion to engage Mark Pollack as an expert in a complicated and difficult bad-faith insurance defense. He met with me promptly after reviewing the pleadings and other voluminous materials. He had an excellent and comprehensive understanding of the facts and issues. His assistance in focusing the defense strategy was of critical importance.

He drafted a detailed expert report in a timely manner. He was always immediately available. He was cooperative in preparing for his deposition and his testimony was everything I could have expected even in the face of an abusive and very lengthy examination.

Mark did not have to testify because of the court's pre-trial rulings, but he made an excellent and credible witness during deposition. I would have no hesitation at all in engaging his services again if the need arises. He fulfilled all of the requirements I listed.

Sincerely,



Philip E. Kaplan

PEK:nm