STATE OF MICHIGAN
IN THE SUPREME COURT

KENNETH M. MOGILL and MOGILL, POSNER & COHEN,

Appellants,

v.

ESTATE OF DIANA LYKOS VOUTSARAS, by KATHLEEN M. GAYDOS, Personal Representative,

Appellee.

SC: 159107

COA: 340714

Ingham CC: 16-000263-NM

APPELLANTS KENNETH M. MOGILL AND MOGILL, POSNER & COHEN'S SUPPLEMENTAL BRIEF IN SUPPORT OF APPLICATION FOR LEAVE TO APPEAL FROM DECISION OF THE MICHIGAN COURT OF APPEALS

ORAL ARGUMENT REQUESTED

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STATEMENT OF ORDER APPEALED AND DATE OF ENTRY

Appellants Kenneth M. Mogill and Mogill, Posner & Cohen (jointly, "Mogill") rely on their "Statement of Order Appealed and Date of Entry" in their Application for Leave to Appeal from Decision of the Michigan Court of Appeals, dated February 11, 2019, at page iv.

QUESTION PRESENTED

Does Michigan's broad witness immunity doctrine bar suits against retained experts for providing allegedly incompetent opinions?

The Court of Appeals and Appellee would answer:	"No"
Mogill and the trial court would answer:	"Yes"

STATEMENT OF FACTS

Mogill relies on his "Statement of Facts as Alleged and Material Proceedings" in his Application for Leave to Appeal from Decision of the Michigan Court of Appeals, dated February 11, 2019, at pages 2-6.

ARGUMENT

> *In the matter of reforming things, as distinct from deforming them, there is one plain and simple principle; a principle which will probably be called a paradox. There exists in such a case a certain institution or law; let us say, for the sake of simplicity, a fence or gate erected across a road. The more modern type of reformer goes gaily up to it and says, "I don't see the use of this; let us clear it away." To which the more intelligent type of reformer will do well to answer: "If you don't see the use of it, I certainly won't let you clear it away. Go away and think. Then, when you can come back and tell me that you do see the use of it, I may allow you to destroy it."*
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> *G.K. Chesterton, "The Thing,"* (1929), URL, http://GCK.ORG.UK/GCK/BOO/KS/The_Thing.txt

I. INTRODUCTION

An expert witness is not an advocate for the party retaining him or her, but is rather an objective guide to the trier of fact on matters within his or her area of expertise, who provides that expertise without regard to the consequences to the retaining party. *See* MRE 702. An expert may, of course, cooperate with retaining counsel, but he or she must remain independent and not let advocacy interfere with independent and honest judgment. "It is in this light we conclude that the path to truth is best paved by immunizing expert witnesses, court-appointed or party-retained, from tort liability." *Harrison v Roitman*, 131 Nev 915, 923; 362 P3d 1138 (2015). *See also Briscoe v LaHue*, 460 US 325, 332-333; 103 SCt 1108 (1983) ("in damages suits against witnesses, the claims of the individual must yield to the dictates of public policy, which requires that the paths which lead to the ascertainment of truth should be left as free and unobstructed as possible"). If allowed to stand, the Court of Appeals decision recognizing a cause of action for expert witness malpractice would inject an inappropriate factor into the process that could have a chilling effect on experts' willingness to testify and lead experts to shade their otherwise impartial opinions to minimize the risk of being sued. Accordingly, this Court should grant leave to appeal.

II. STANDARD OF REVIEW

Whether immunity applies is a question of law this Court reviews *de novo*. *Maiden v Rozwood*, 461 Mich 109, 118; 597 NW2d 817 (1999). Grants and denials of summary disposition also are reviewed *de novo*. *Id.* *De novo* means this Court should conduct an independent review of the legal issues and need not defer to the courts below. *People v Bruner*, 501 Mich 220, 226; 912 NW2d 514 (2018).

III. STRONG POLICY CONSIDERATIONS SUPPORT MAINTAINING IMMUNITY FOR RETAINED EXPERTS SUED FOR PROFESSIONAL NEGLIGENCE

A. Abrogating experts' immunity would impair the integrity of judicial proceedings.

For well over a century, this Court has unqualifiedly endorsed according broad immunity to all participants in judicial proceedings. *See Maiden*, 461 Mich at 134; *Daoud v De Leau*, 455 Mich 181, 202; 565 NW2d 639 (1997); *Sanders v Leeson Air Conditioning Corp*, 362 Mich 692, 695-696; 108 NW2d 761 (1961); *Timmis v Bennett*, 352 Mich 355, 364; 89 NW2d 748 (1958); *Hartung v Shaw*, 130 Mich 177, 179; 89 NW 701 (1902); *Hart v Baxter*, 47 Mich 198, 200-201; 10 NW 198 (1881). Specifically, immunity "should be liberally construed so that participants in judicial proceedings are free to express themselves without fear of retaliation." *Maiden*, 461 Mich at 134, citing *Sanders*, 362 Mich at 695. *See also Daoud*, 455 Mich at 202 ("Witness immunity is also grounded in the need of the judicial system for testimony from witnesses who, taking their oath, are free of concern that they themselves will be targeted by the loser for further litigation"). This Court applied these principles to expert witnesses in *Maiden* when it held that expert witnesses are wholly immune from liability for the consequences of purported professional negligence in providing "testimony or related evaluations" because – like fact witnesses – expert

witnesses must be "free to express themselves without fear of retaliation." *Maiden*, 461 Mich at 134.

The essential principles protected by witness immunity should not be impaired by carving an exception for retained experts under the guise of a separate "duty" owed to the litigant retaining the expert, because these principles apply equally to retained experts. Specifically, every expert witness's duty is to impartially assist the trier of fact, and that duty is owed to the court, not to any litigant. *Maiden*, 461 Mich at 133-134.[1] Put another way, "In our legal system, demanding that experts 'deliver' a specified opinion, as opposed to their honest judgment, is supposed to be ethically out-of-bounds—not the basis for a cause of action." *Pace v Swerdlow*, 519 F3d 1067, 1077 (CA 10 2008) (Gorsuch, J, dissenting; citations omitted). Other jurisdictions likewise have recognized the primacy of an expert's commitment to impartiality. Thus, the Wisconsin Supreme Court held that "a contract creating an obligation not only to appear but also to testify in a certain manner on behalf of a party to a lawsuit, is against public policy…. [U]nder no circumstances will an agreement to give favorable testimony be sanctioned by the courts." *Griffith v Harris*, 17 Wis2d 255, 259-260; 116 NW2d 133 (1962). *See also Curtis v Wolfe*, 160 Ill App 3d 588, 592 (1987) ("parties may lawfully contract between themselves that a doctor will appear and testify at trial and we believe that a contract creating any further obligation with regard to the type of testimony [is] against public policy"). "Fundamentally, no witness can be required to testify, and no witness should be expected to testify, to anything other than the truth as he sees it and according to what

[1] *Accord Bruce v Byrne-Stevens & Associates Engineers, Inc*, 113 Wash2d 123, 129-130; 776 P2d 666 (Wash 1989) ("While it may be that many expert witnesses are retained with the expectation that they will perform as 'hired guns' for their employer, as a matter of law the expert serves the court"); *Harrison*, 131 Nev at 923 ("Experts may be sought after and procured subject to the understanding that they will provide statements in support of a party's particular position. However, under the law, an expert's opinion is not admitted to assist one party or the other; rather, it is admitted to assist the trier of fact by providing specialized knowledge").

he believes it to be. The same is expected of expert witnesses." *Schaffer v Donegan*, 66 Ohio App 3d 528, 538; 585 NE2d 854 (1990).[2] By creating a second, paramount duty owed to the party who retained the expert, the Court of Appeals decision injects an inappropriate factor that could lead an expert to shade his or her opinion to further the case of the retaining party to minimize the risk of being sued. Recognition of a cause of action for expert witness malpractice would thus frustrate this State's well-settled public policy that an expert witness's role is to serve as an ***objective*** guide to the trier of fact.

Courts faced a similar issue in balancing the duty owed to the judicial system and the duty owed to a party when deciding whether to allow a civil remedy to a litigant injured by perjured testimony. Courts, including this Court in *Daoud, supra*, determined that the integrity of the judicial system must be the primary policy consideration. For example, in *Briscoe, supra*, the United States Supreme Court extended absolute immunity to witnesses who give perjured testimony in criminal proceedings because the integrity of the judicial system is more important than compensating tort victims. "[I]n damages suits against witnesses, the claims of the individual must yield to the dictates of public policy, which requires that the paths which lead to the ascertainment of truth should be left as free and unobstructed as possible." *Briscoe*, 460 US at

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[2] Mogill's engagement letter contains a model of this principle:

> *The opinions I provide in connection with this engagement will be based on my professional judgment regardless of whether they are favorable or unfavorable to any position advanced by you in the litigation. Any opinion I express will at all times be arrived at independently, and my entitlement to payment pursuant to the terms of this agreement is not in any way dependent on either any opinion I express or the outcome of the matter. In addition, any opinion I provide will be based on the information available to me at the time and will be subject to change if or as additional information is revealed.*

Appx. 39a-40a, Engagement Letter, attached as Exhibit 2 to Mogill's Motion for Summary Disposition and Brief in Support, which is Exhibit 2 in the Appendix.

332-333 (internal quotation marks and citation omitted). "There is, of course, the possibility that… some defendants might indeed be unjustly convicted on the basis of knowingly false testimony." *Id.* at 345. "But we have recognized, again and again, that in some situations, the alternative of limiting the [witness's] immunity would disserve the broader public interest." *Id.* An unjustly convicted defendant's remedy is, therefore, against the state in appellate proceedings, not against the perjurer.

In other words, there will be plaintiffs who are severely harmed by a witness's perjurious testimony, and immunity leaves these injured parties with no recourse against that individual. Justice and fairness arguably suggest there should be an exception from immunity to permit suit against witnesses who maliciously testify falsely. But immunity is allowed, indeed required, because the truth-seeking process is more important than any one litigant's alleged injury, which may or may not, in fact, be the result of a witness's intentionally false testimony. The trial process as a whole would be prejudicially impaired and would became an avenue of de facto retrial without unconditional, absolute immunity for all witnesses, even lying witnesses.[3] *Id.* at 333, 345-346. The "fear of subsequent liability" makes witnesses "reluctant to come forward to testify" in the first instance, and even if a witness takes the stand, the witness "might be inclined to shade his

[3] This public policy is so robust that it singlehandedly supported an immunity that went undisturbed for generations:

> *We have therefore a large collection of cases where from time to time parties have attempted to get damages in cases like the present, but in no one instance has the action ever been held to be maintainable. If for centuries many persons have attempted to get a remedy for injuries like the present, and there is an entire absence of authority that such remedy exists, it shews the unanimous opinion of those who have held the place which we do now, that such an action is not maintainable.*

Id. at 331 fn 10, quoting *Henderson v Broomhead*, 157 Eng Rep 964, 968 (Ex 1859).

testimony in favor of the potential plaintiff… and thus deprive the finder of fact of candid, objective, and undistorted evidence." *Id.* at 333 (citation omitted). The deterrence created by potential liability applies equally to retained experts.

This Court has aptly noted that "the integrity of our judicial system" depends on litigants' use of "real experts instead of 'hired guns.'" *McDougall v Schanz*, 461 Mich 15, 25 fn 9; 597 NW2d 148 (1999). Allowing suits against retained experts would further move litigation toward the already troublesome tendency of reliance on a class of professional experts whose opinions can be bought. *See, e.g. Bruce*, 113 Wash2d at 130-131 ("The threat of civil liability based on an inadequate final result in litigation would encourage experts to assert the most extreme position favorable to the party for whom they testify. It runs contrary to the fundamental reason for expert testimony, which is to assist the finder of fact in a matter which is beyond its capabilities. To the extent experts function as advocates rather than impartial guides, that fundamental policy is undermined"). And "[i]nstitutional integrity, after all, is at the core of institutional effectiveness." *Matter of Probert*, 411 Mich 210, 225; 308 NW2d 773 (1981). This Court should not endanger that integrity by making expert witnesses liable to the litigant who retained them.

B. Protection for retained experts should not be carved out of *Maiden*'s broad witness immunity doctrine.

This Court in *Maiden* held that expert witnesses "are wholly immune from liability for the consequences of their" professional incompetence in the course of their "testimony or related evaluations." *Maiden*, 461 Mich at 134. "The privilege should be liberally construed," the Court reasoned, because expert witnesses must be "free to express themselves without fear of retaliation." *Id*. Although the medical examiner sued in *Maiden* was adverse to the plaintiff, that was not relevant to this Court's rationale for ensuring experts are immune for giving even allegedly incompetent advice and opinions. Rather, the "fear of retaliation," which the *Maiden* Court held

justified "liberally construed" absolute immunity, is equally problematic whether applied to an adverse or retained expert. Principles of stare decisis demand that precedent, broadly applying immunity to adverse experts and retained experts alike, be followed.

"The application of stare decisis is generally the preferred course, because it promotes the evenhanded, predictable, and consistent development of legal principles, fosters reliance on judicial decisions, and contributes to the actual and perceived integrity of the judicial process." *People v Tanner*, 496 Mich 199, 250; 853 NW2d 653 (2014) (citation and quotation marks omitted). "[U]nder the doctrine of stare decisis, principles of law deliberately examined and decided by a court of competent jurisdiction should not be lightly departed." *People v Graves*, 458 Mich 476, 480; 581 NW2d 229 (1988) (citation omitted). "Before this court overrules a decision deliberately made, it should be convinced not merely that the case was wrongly decided, but also that less injury will result from overruling than from following it." *Id.* at 481 (citation omitted).

Factors for the Court to consider include whether changes in the law or facts no longer justify the decision and whether the decision defies practical workability. *Robinson v City of Detroit*, 462 Mich 439, 464; 613 NW2d 307 (2000). Here, far from defying practical workability, the current rule from *Maiden* is both workable and supported by long-standing public policy considerations, all of which to this day remain fundamental to the integrity and efficacy of judicial proceedings in this State and none of which have been eroded by any changes in the law or facts. Far greater harm would result from recognizing a cause of action for expert witness malpractice.

First, *Maiden* should be followed in order to preserve, as discussed *supra*, the impartial role of a retained expert witness in serving as an objective guide in providing specialized knowledge to the trier of fact in its pursuit of the truth. *See* MRE 702. An expert witness is not

an advocate for the retaining party, does not have the retaining party for a client, and does not owe a duty to the retaining party. *See id.*; *Maiden*, 461 Mich at 133-134. Abandoning or watering down the holding from *Maiden* by creating a duty owed to the party who retained the expert would introduce an improper factor that could impair the expert's ability to remain independent and interfere with her honest judgment in the performance of her evaluation and provision of her otherwise objective opinion.

In theory, one could argue that *Maiden* should be overruled because a retained expert should owe a duty to provide a competent, if not a favorable, opinion. But the distinction between "unfavorable" and "incompetent" is hardly a bright line, and the expert would still be incentivized to shade her opinion to assist the retaining party rather than face costly litigation over the issue of whether an opinion was merely unfavorable or incompetent. *See Briscoe*, 460 US at 333 fn 29 (witness immunity extends to perjured testimony because "lawsuits alleging perjury… often raise material questions of fact, inappropriate for disposition at the summary judgment stage," and if immunity did not extend to perjured testimony, then witnesses would be incentivized to shade their testimony rather than expose themselves to retaliatory litigation that could not be expeditiously disposed of).

Another potential argument in favor of a carveout from the broad immunity described in *Maiden* is that it should not extend to out-of-court professional services rendered by an expert witness, which are arguably separate from the judicial proceeding itself. But *Maiden*'s holding, that the medical examiner was immune from suit for actions that "did not occur in any judicial proceeding" and that immunity extends to "testimony or related evaluations," *Maiden*, 461 Mich at 134-135, seemingly was for the same reason: Any expert's work includes out-of-court

preparation, and creating easy-to-plead exceptions would effectively vitiate the truth-promoting policies immunity serves.

Appellee also may argue that the deterrent of potential civil liability is needed to prevent expert witnesses from committing malpractice, but this is not so. If an expert witness would perform his or her work negligently, the retaining attorney undoubtedly would never use the expert again and would never recommend the expert to any other attorney. With lawyers being known to talk to one another and attorney referrals being the largest pipeline of work for many experts, it is likely that the incompetent expert witness's "career" would be either finished or else on life support.

The witness immunity doctrine also does not protect expert witnesses from professional disciplinary action, even when the conduct giving rise to the disciplinary proceeding occurred in a judicial proceeding. *Austin v American Ass'n of Neurological Surgeons,* 253 F3d 967 (CA 7 2001) (affirming dismissal of neurosurgeon's claim against association for suspending him for providing "irresponsible" testimony in medical malpractice case); *Deatherage v State, Examining Bd of Psych,* 134 Wash 2d 131, 137; 948 P2d 828 (1997) (witness immunity did not bar disciplinary action against psychologist for failing to meet ethical standards in professional services offered in child custody cases). These reputational, economic and professional factors already provide compelling incentives for expert witnesses to perform their engagements competently, and the additional threat of civil liability would not lead to an appreciable improvement in expert competency, if any. In any event,

> *possible gains of this type [if any] have to be weighed against the threatened losses in objectivity described above. We draw that balance in favor of immunity. Civil liability is too blunt an instrument to achieve much of a gain in reliability in the arcane and complex calculations and judgments which expert witnesses are called upon to make. The threat of liability seems more likely to result in experts offering*

> *opinions motivated by litigants' interests rather than professional standards and in driving all but the full-time expert out of the courtroom.*

Bruce, 113 Wash2d at 131.

A **second** policy reason supporting the holding in *Maiden* is that "the fear of retaliation," which would be triggered should this Court recognize a tort for expert witness negligence, will unquestionably deter at least some true experts from assisting in litigation or in pre-litigation case reviews. This would increase the cost of justice to both plaintiffs and defendants and inhibit the development of new theories. *See, e.g., Merrick v Burns, Wall, Smith & Mueller, PC*, 43 P3d 712, 714-715 (Colo App 2001) ("An expert would be hesitant to provide consultation for a certificate of review if he or she would be subject to retaliatory lawsuits from litigants who disagree with the methods used by an expert in formulating his or her opinion"). The Washington Supreme Court recognized that immunity for retained experts promotes justice ***because*** it enables a more diverse universe of qualified experts to serve as witnesses. *Bruce, 11*3 Wash2d at 130-131. Absent immunity, "[o]nly professional witnesses will be in a position to carry insurance to guard against such liability. The threat of liability would discourage the one-time expert – the university professor, for example – from testifying. Such one-time experts, however, can ordinarily be expected to approach their duty to the court with great objectivity and professionalism." *Id.*

In Michigan, a number of causes of action require the presentation of an expert opinion. For example, expert testimony is required in professional malpractice actions in order to establish the applicable standard of conduct, the breach of that standard and causation. *Elher v Misra*, 499 Mich 11, 21; 878 NW2d 790 (2016); *Law Offices of Lawrence J Stockler, PC v Rose*, 174 Mich App 14, 48; 436 NW2d 70 (1989); *Broz v Plante & Moran, PLLC*, 326 Mich App 528, 539; 928 NW2d 292 (2018); *Rice v Jaskolski*, 412 Mich 206, 211; 313 NW2d 893 (1981). Expert testimony also may be required in toxic tort cases. *See Lowery v Enbridge Energy Limited Partnership*, 500

Mich 1034; 898 NW2d 906, 907 (2017) (Markman, C.J., concurring). Family law is another practice area in which various experts are, in effect, needed. *See, e.g., Riemer v Johnson*, 311 Mich App 632, 648-649; 876 NW2d 279 (2015); *Woodington v Shokoohi*, 288 Mich App 352, 363; 792 NW2d 63 (2010). Unless the holding from *Maiden* is followed, the prospect of being sued will create a chilling effect on the willingness of professionals, who already may be reluctant to involve themselves in litigation, to assist litigants and prospective litigants in providing needed testimony.[4]

A **third** policy reason supporting *Maiden* is that protecting retained experts from suit for incompetent opinions does not leave litigants without a remedy. It is the attorney responsible for the litigation who undertakes the obligation of deciding whether an expert is needed, which expert to select, whether to disclose the expert, how to prepare the expert, whether the expert's opinion likely passes muster under MRE 702 and, ultimately, whether the expert's opinion should be offered to support a case. Put another way,

> *An expert is not a mechanical toy that can simply be wound up and turned loose. Regardless of the expert's skill, it is the lawyer's responsibility to make sure that his or her expertise is presented to the trier of fact in an admissible and persuasive way. To accomplish this task, the lawyer needs to understand the substantive details of the expert's testimony and field of expertise.*

California Expert Witness Guide (Cont.Ed.Bar 2019-2020) §8.29. The attorney's duty includes ensuring "that the expert, particularly the inexperienced expert, understands the governing legal

[4] Without immunity, the common and beneficial practice of litigants and their attorneys consulting informally with an expert either before suit is filed or early in the case, often to obtain a preliminary opinion as to the viability of a case or defense, would likely become a relic of the past. Few experts would be willing to expose themselves to liability without receiving compensation, and litigants and their attorneys would not consult as much if there was a fee. As a result, more meritless claims and defenses would crowd the courts' dockets, and viable but novel claims would not be brought. Immunity, on the other hand, promotes access to meaningful and affordable justice to plaintiffs and defendants alike.

principles and elements that each party to the litigation must prove in order to prevail." *Id* , §8.28. An attorney's breach of his or her duty concerning retained experts gives rise to liability in legal malpractice. *See, e.g., Quad City Bank & Trust v Elderkin & Pirnie, PLC,* 870 NW2d 249 (Iowa Ct App 2015) (law firm may be sued for retaining inappropriate expert); *Costanzo v Pennsylvania Turnpike Comm'n,* 2001 WL 846474 (CCP Allegheny 2001) (same).

In the seemingly rare case in which a plaintiff's injury is caused solely by his own expert's negligence, admittedly there could be a harsh result. But, as this Court recognized in *Maiden, supra*, the possibility of a harsh result is intrinsic to the immunity granted to adverse expert witnesses, to the immunity granted to fact witnesses who testify falsely and with malice, and to all immunities granted by law. For these reasons, this Court rightly has decided that to limit immunity and thereby erode the integrity of the judicial system would constitute a greater harm. *See id.* As Judge Learned Hand wrote years ago:

> *As is so often the case, the answer must be found in a balance between the evils inevitable in either alternative. In this instance it has been thought in the end better to leave unredressed the wrongs done by dishonest [witnesses] than to subject those who try to do their duty to the constant dread of retaliation.*

Briscoe, 460 US at 345, quoting *Gregoire v Biddle,* 177 F2d 579, 581 (CA 2 1949). For the same fundamental public policy reasons, the privilege of witness immunity should continue to apply to non-adverse experts sued for malpractice.

IV. STATEMENT OF RELIEF SOUGHT

For the reasons stated in Mogill's Application for Leave to Appeal from Decision of the Michigan Court of Appeals as well as for those stated above, Mogill respectfully requests that this Court grant leave to appeal the Court of Appeals' January 3, 2019 published decision reversing the Circuit Court's grant of Mogill's motion for summary disposition as to claims arising out of an expert engagement of Mr. Mogill. Alternatively, Appellants ask the Court to enter an order

pursuant to MCR 7.305(H)(1) peremptorily reversing the Court of Appeals decision and reinstating the trial court decision.

Respectfully submitted,

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Dated: January 23, 2020

PROOF OF SERVICE

I hereby certify that on **January 23, 2020**, the following pleadings were electronically e-filed with the State of Michigan Supreme Court using the Court's electronic filing system: **(1) Appellants Kenneth M. Mogill and Mogill, Posner & Cohen's Supplemental Brief in Support of Application for Leave to Appeal from Decision of the Michigan Court of Appeals, Oral Argument Requested; and (2) this Proof of Service**.

Respectfully submitted,

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