1 2 3 4 5	ALLEN RUBY, SB #47109 LAW OFFICES OF ALLEN RUBY 125 South Market Street, Suite 1001 San Jose, CA 95113-2379 Telephone: 408 998-8500 Facsimile: 408-998-8503 CRISTINA C. ARGUEDAS, SB #87787 TED W. CASSMAN, SB #98932 ARGUEDAS, CASSMAN & HEADLEY, I	LLP	
6 7	803 Hearst Avenue Berkeley, CA 94710 Telephone: 510-845-3000 Facsimile: 510-845-3003		
8 9 10 11	DENNIS P. RIORDAN, SB # 69320 DONALD M. HORGAN, SB #121547 RIORDAN & HORGAN 523 Octavia Street San Francisco, CA 94102 Telephone: 415-431-3472 Facsimile: 415-552-2703		
12 13	Attorneys for Defendant BARRY BONDS		
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15			
16	UNITED STATES DISTRICT COURT		
17	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION		
18 19	SAN FRANC	ISCO DIVISION	
20	UNITED STATES OF AMERICA,	) Case No.: CR 07-0732 SI	
21	Plaintiffs,	) ) DEFENDANT'S WITNESS LIST	
22	vs.	) ) Trial Date: March 21, 2011	
23	BARRY LAMAR BONDS,	) Hon: Susan Illston	
24	Defendants		
25		_ )	
26	Pursuant to the Court's Order for Pretrial Preparation, Defendant Barry L. Bond		
27	respectfully submits a partial list of witnesses who may be called by the defense at trial		
28	Mr. Bonds previously filed a Witness List on February 13, 2009. Thereafter on		
	Defendant's Witness List		

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February 19, 2009, the Court issued its Order Re: Defendant's Motions In Limine ("the
 February 19, 2009 Order"). In light of the February 19, 2009 Order, Defendant has not
 listed witnesses whose testimony would relate to evidence which the Court has excluded.

Harvey Shields. Mr. Shields was a trainer for Mr. Bonds. If called as a
 witness, Mr. Shields may testify to his personal interactions with Mr. Bonds, Greg
 Anderson, and other potential Government witnesses.

2. <u>Mark Letendre</u>. Mr. Letendre was a trainer for the San Francisco Giants. If
called as a witness, Mr. Letendre may be asked about his personal interactions with Mr.
Bonds, Greg Anderson, and other potential Government witnesses.

<u>Michael Rains</u>. Mr. Rains is an attorney. If called as a witness he may testify
 to promises and representations made by the Government prior to Mr. Bonds' Grand Jury
 testimony, as well as interactions between the Government and Mr. Bonds after the
 promises and representations were made, but before he testified.

4. Dr. Ronald Swerdloff. Dr. Swerdloff is a medical doctor specializing in 14 endocrinology, internal medicine and andrology. As the Director, Harbor-UCLA 15 Reproductive Program – World Health Organization Collaborative Center for Reproduction, 16 he has extensive experience in the study and treatment of pituitary gland, including human 17 growth hormone replacement therapy. He is a renowned expert in fields of research 18 regarding effects of exogenous consumption of testosterone and other androgens (steroids), 19 as well as of grown hormone. He has testified as a medical expert in numerous court 20 matters. A copy of his *curriculum vitae* is attached. Dr. Swerdloff may testify to his 21 opinions concerning the likely effects of anabolic steroids and human growth hormone, as 22 23 established by peer review studies and reliable scientific methods and procedures.

5. The individuals listed below are all law enforcement agents who, among other
things, conducted interviews of individuals who may be Government witnesses. If such
persons give testimony which is subject to impeachment by their prior statements, the
individuals listed below may be called to testify to the prior statements:

28

## Jeff Novitzky

Defendant's Witness List

1	Ken Bonano		
2	Erwin Rogers		
3	Jon Colombet		
4	Ed Barberini		
5	Christopher Fuelling		
6	Brian Cook		
7	Heather Young		
8	Anthony Montero		
9	Douglass Doss		
10	John Posusney		
11	Steve Coffin		
12	Vincent Browning		
13	Gregory Jenkins		
14	This list does not include all potential defense witnesses. In the judgment of counsel,		
15	listing all such witnesses – for example, impeachment witnesses – would be inconsistent		
16	with the Defendant's right to an effective defense. <sup>1</sup> Such a list could provide the		
17	Government with insight into the defense assessment of weaknesses in the Government's		
18	case. It would alert Government witnesses to likely areas of cross-examination, and it		
19	would provide untruthful Government witnesses – if there are any – with advance warning		
20	of conversations, relationships and transactions to which impeaching evidence which is and		
21	is not available for presentation at trial.		
22	Respectfully submitted,		
23	DATED: October 15, 2010 LAW OFFICES OF ALLEN RUBY		
24			
25	/s/ Allen Ruby, Attorney for		
26	Defendant Bonds,		
27			
28	<sup>1</sup> A number of impeaching witnesses unavoidably had to be identified on this Witness List because they are law		
	enforcement agents who will probably be subpoenaed through the Government.		

|| Defendant's Witness List

1	DATED: October 15, 2010	ARGUEDAS, CASSMAN & HEADLEY, LLP
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3		/s/ Cristina A. Arguedas, Attorney for Defendant Bonds,
4		Defendant Bonds,
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	Defendant's Witness List	4