

SCHEDULE “D”
DEFENDANTS’ WITNESS LIST

Defendant Edward Magedson (by deposition and declaration)
c/o Defense Counsel
Likely to be called

Ben Smith
c/o Defense Counsel
Likely to be called

Xcentric Ventures L.L.C. Content Monitors
Amy Thompson, G. Young, Heather Norton, Kim Jordan, Jackie Wynne, Kim Smith,
Lynda Craven, Mary Jo Baker, C. Bowen, Paulette Craven
c/o Defense counsel
Not likely to be called to be called because Defendants anticipate that Plaintiff will stipulate to the facts that Content Monitors have submitted in sworn declarations that support Defendants’ Motion for Summary Judgment. In the alternative, Defendant will seek leave to allow Content Monitors to testify by video link or by deposition before trial.

Laura Rogal, Esq
c/o Defense Counsel
Not likely to be called to authenticate and explain research and documents about WIN, because we expect Plaintiffs to stipulate to admit the documents

Dixon Earl Woodard
dicksonwoodard@tx.rr.com
(972) 765-4658
Not likely to be called. Defendants have moved in limine to exclude Mr. Woodard’s deposition testimony from an unrelated case, and will only call Mr. Woodard to rebut any information that is introduced over objection.

Ron Simons, Co-President and Director of WIN, and Corporate Representative on Topics designated in his notice of deposition
c/o Plaintiff’s Counsel
Likely to be called

Russell Whitney, WIN’s former CEO and Chairman of the Board of Directors
c/o Plaintiff’s Counsel
Likely to be called

Alfred Novas, Co-President and Chief Financial Officer, WIN, WIN's designated contact regarding the report of the Special Committee of independent directors to conduct an internal investigation of the activities that are the subject of the government investigation (i.e. S.E.C. and Grand Jury investigations).

c/o Plaintiff's Counsel

Likely to be called

John T. Reed

342 Bryan Drive, Alamo, CA 94507 (925) 820-7262, johnreed@johntreed.com.

Likely to be called

Robert Paisola

63 East 11400 South, Suite 221

Sandy, Utah 84070

(801) 671-7843

Likely to be called

Madeline Azarian – Yates

P.O. Box 292

Hubbardston, MA 01452

(978) 928-3808

Likely to be called

Jay Burland

9056 East Maple Drive

Scottsdale, AZ 85255

(480) 513-9222.

Likely to be called.