

**Jenkins & Gilchrist**

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225 WEST WASHINGTON STREET  
SUITE 2800  
CHICAGO, ILLINOIS 60606-3418(312) 425-3900  
FACSIMILE (312) 425-3909

www.jenkins.com

AUSTIN, TEXAS  
(512) 499-3800DALLAS, TEXAS  
(214) 855-4500HOUSTON, TEXAS  
(713) 851-3300LOS ANGELES, CALIFORNIA  
(310) 820-8800NEW YORK, NEW YORK  
(212) 704-6000SAN ANTONIO, TEXAS  
(210) 246-5000WASHINGTON, D.C.  
(202) 828-1500JOHN P. COLLINS  
(312) 425-8520  
jcollins@jenkens.com

January 14, 2002

**VIA FACSIMILE AND MAIL**Richard R. Young  
Travis T. Tygart  
Holme Roberts & Owen LLP  
90 South Cascade Avenue  
Suite 1300  
Colorado Springs, Colorado 80903

Re: USADA v. Justin Gatlin

Dear Rich and Travis:

In accordance with the hearing panel's order, here is my client's potential witness list for the arbitration currently scheduled for January 29, 2002 in Atlanta. As we continue to work on stipulations, this list may change. I have not included an ADHD expert since the international panel of doctors involved in the petition for early reinstatement have agreed that (i) Justin has been properly diagnosed with ADHD and (ii) his prescription medicine, Adderall, and its prescribed dosage are appropriate. Also, I may need to supplement this witness list to add additional experts should you call some of the potential experts set forth in your January 7, 2002 letter.

**List of Potential Witnesses for Justin Gatlin**

1. **Justin Gatlin**  
Mr. Gatlin may testify concerning the facts and circumstances of this case.
2. **Jeanette Gatlin**  
Ms. Gatlin is Mr. Gatlin's mother. She may be called upon to testify with respect to her various correspondence with USADA, USA Track & Field, the University of Tennessee and the United States Olympic Committee.

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3. **Vince Anderson**  
Mr. Anderson is Mr. Gatlin's track coach at the University of Tennessee. Mr. Anderson signed up Mr. Gatlin to participate in the USA Track & Field Junior Nationals. He may be called upon to testify about these procedures and the reasonable accommodations that the University of Tennessee and the NCAA have made in order for Mr. Gatlin to be able to continue to compete in NCAA events.
  4. **Dr. Val Gene Ivan**  
Dr. Ivan is the team doctor for the University of Tennessee track team. Dr. Ivan was informed by Mr. Gatlin that he had been prescribed, and was taking, Adderall to treat his disability. Based upon our previous discussions, I believe that we should be able to resolve this issue through a stipulation.
  5. **Dr. Robin E. Barnett**  
Dr. Barnett, Mr. Gatlin's treating physician, prescribed Adderall to treat Mr. Gatlin's disability. Based upon our previous discussions, I believe that we should be able to resolve this issue through a stipulation.
  6. **USA Track & Field Official**  
A USA Track & Field official may be called upon to testify about the USA Junior Nationals and USATF's relationship with USADA.
  7. **Terrence P. Madden**  
Mr. Madden is the Chief Executive Officer of USADA. Mr. Madden may be called upon to testify about USADA's receipt of federal funds, what, if any, individualized, reasonable accommodations USADA has made for Mr. Gatlin and other disabled individuals, and USADA's drug testing protocol and education programs, if any.
  8. **Medical Expert**  
Mr. Gatlin may call a medical expert to testify about the elimination rate for Adderall. Based upon our previous discussions, I believe that we should be able to resolve this issue through a stipulation.
  9. **Court of Arbitration of Sport Expert**  
Mr. Gatlin may call an expert to testify about cases in which arbitrators have instituted penalties less than the "mandatory" minimum "required" by an international federation in order to maintain proportionality between the offense and the penalty and other substantive due process concerns. Based upon our previous discussions, I believe that we should be able to resolve this issue through a stipulation.
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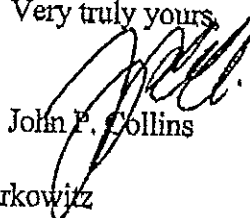
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If you have any questions or concerns related to this witness list, please do not hesitate to contact me.

In closing, thank you for your continuing efforts to resolve this matter amicably through the on-going early reinstatement procedures with the IAAF. We remain committed to those efforts and will continue to work with you to bring about such a just resolution.

Very truly yours,



John P. Collins

cc: Christopher L. Cambell, Kenny & Markowitz  
Carmen Frobos, American Arbitration Association  
Walter G. Gans, Kaye Scholer LLP  
Edward V. Lahey, Jr.

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225 WEST WASHINGTON ST.  
SUITE 2600  
CHICAGO, ILLINOIS 60606

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**FROM THE DESK OF:**

John P. Collins  
(312) 425-8520

| RECIPIENT               | COMPANY              | FAX No.        | PHONE No. |
|-------------------------|----------------------|----------------|-----------|
| 1. Richard R. Young     | Holme Roberts & Owen | (719) 633-1518 |           |
| 2. Travis T. Tygart     | Holme Roberts & Owen | (719) 633-1518 |           |
| 3. Christopher Campbell | Kenny & Markowitz    | (415) 397-3170 |           |
| 4. Carmen Frobos        | AAA                  | (404) 325-8034 |           |
| 5. Walter Gans          | Kaye Scholer         | (212) 836-6725 |           |
| 6. Edward V. Lahey      | (860) 767-1729       |                |           |

**• MESSAGE •**

Please see attached.

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