

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JAYME GORDON,

Plaintiff,

v.

DREAMWORKS ANIMATION SKG, INC.,  
DREAMWORKS ANIMATION LLC, and  
PARAMOUNT PICTURES, CORP.,

Defendants.

C.A. No. 1:11-cv-10255-JLT

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**PLAINTIFF'S LIST OF PROPOSED DEPONENTS**

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Pursuant to the Modified Discovery Order and Notice of Scheduling Order, Plaintiff

Jayme Gordon hereby identifies the following people whom Plaintiff may notice for deposition.

<b><u>DEPONENT</u></b>	
1.	<b>NICOLAS MARLET:</b> Illustrator and character designer for DreamWorks; creation and development of the characters featured in Defendants' Kung Fu Panda movies
2.	<b>MICHAEL LACHANCE:</b> Former Development Executive of DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies
3.	<b>CYRUS VORIS:</b> Writer for DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies
4.	<b>ETHAN REIF:</b> Writer for DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies
5.	<b>MARK OSBORNE:</b> Director for DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies
6.	<b>JOHN STEVENSON:</b> Director for DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies

<b><u>DEPONENT</u></b>	
7.	<b>JONATHAN ABEL:</b> Screenplay writer for DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies
8.	<b>GLENN BERGER:</b> Screenplay writer for DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies
9.	<b>CHRIS KUSER:</b> Development Executive for DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies
10.	<b>RAPHE BECK:</b> Former staff writer for DreamWorks; origin of Defendants' Kung Fu Panda story and characters
11.	<b>KATE SWANBORG:</b> DreamWorks Executive; writer; origin of Defendants' Kung Fu Panda story and characters
12.	<b>LANCE YOUNG:</b> Former employee of DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies
13.	<b>ERIC SWANBORG:</b> Writer; production manager; origin of Defendants' Kung Fu Panda story and characters
14.	<b>MICHAEL EISNER:</b> Former Chief Executive Office, The Walt Disney Co.; request for, submission of, and knowledge of Plaintiff's works
15.	<b>SHARON EISEN:</b> Former employee, The Walt Disney Co.; request for, submission of, and knowledge of Plaintiff's works
16.	<b>JEFFREY KATZENBERG:</b> Chief Executive Office, DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies; submission and knowledge of Plaintiff's works
17.	<b>RICH SULLIVAN:</b> Head of Corporate Finance, DreamWorks; Defendants' revenue and profits; damages
18.	<b>BILL DAMASCHKE:</b> Executive Producer / Chief Creative Officer, DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies
19.	<b>MELISSA COBB:</b> Producer, DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies

<b><u>DEPONENT</u></b>	
20.	<b>TIM PERRY:</b> Former research employee, DreamWorks; creation and development of Defendants' Kung Fu Panda story, characters, and movies
21.	<b>KENNETH PARTELLO:</b> Illustrator; creation and development of Plaintiff's works
22.	<b>EMILY BLUMSACK:</b> Acquaintance of Plaintiff; submission and knowledge of Plaintiff's works
23.	<b>ANDREW BLUMSACK:</b> Related to Emily; formerly affiliated with DreamWorks; submission and knowledge of Plaintiff's works
24.	<b>DIANE KORO:</b> Former web-developer for Plaintiff; development of Plaintiff's websites and works
25.	<b>PATRICIA M. BOYDEN:</b> Former assistant for Plaintiff; creation and development of Plaintiff's works; submission of Plaintiff's materials
26.	<b>CORPORATE WITNESSES OF DEFENDANTS</b>
27.	<b>EXPERT WITNESSES OF DEFENDANTS</b>

Plaintiff respectfully reserves the right to expand or modify this list based on further information revealed as discovery continues, including any persons identified by Defendants as having relevant knowledge.

Dated: June 30, 2011

/s/ Gregory A. Madera

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ATTORNEYS FOR PLAINTIFF  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 30<sup>th</sup> day of June, 2011.

/s/ Gregory A. Madera

Gregory A. Madera

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