

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)	
JAYME GORDON,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:11-cv-10255-JLT
)	
DREAMWORKS ANIMATION SKG,)	
INC., DREAMWORKS ANIMATION)	
LLC, and PARAMOUNT PICTURES)	
CORP.,)	
)	
Defendants.)	
)	
)	

DEFENDANTS’ LIST OF PROPOSED DEPONENTS

DreamWorks Animation SKG, Inc., DreamWorks Animation LLC, and Paramount Pictures Corporation (collectively “DreamWorks”) present the following lists of proposed depositions pursuant to the Court’s Modified Discovery Order.

1. Jayme Gordon;
2. The Jayme Gordon Company 30(b)(6);
3. Small World Enterprises 30(b)(6);
4. Ken Partello;
5. Diane Koro;
6. DreamWorks also seeks to preserve the right to depose:
 - a. Any individual who is hereafter identified as having participated in, or has knowledge of, the creation, development or dissemination of the work (or works) to Defendants that Jayme Gordon alleges are infringed in this action, or who worked with Jayme Gordon during the time period in which the work (or works) are alleged to have been created (potentially including but not limited to Trish Boyden, Irvin Gallop and Denise Gorham);

- b. Any individual Jayme Gordon proposes to present as a witness at trial, including but not limited to those individuals who provided the signed statements in support of Mr. Gordon's case and that Mr. Gordon produced at JG001651-8 (potentially including but not limited to Cindy Savage, Derek Tuttle, Daime Gordon, David Gordon and Jackie Gordon);
- c. Expert witnesses for Jayme Gordon.

Respectfully submitted,

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

By their attorneys,

/s/ David A. Kluff

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June 30, 2011

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and copies will be sent to those indicated as non-registered participants on the above date.

/s/ David A. Kluff