

# Exhibit A

**EXHIBIT A**

**Plaintiffs' Witness List**

**PLAINTIFFS**

1. **Bach, Martin** (live)<sup>1</sup> – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
2. **Al Shirawi, Najla** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
3. **Mallis, Anthony** (may call) (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
4. **Saif, Abdul** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
5. **Marshad, Ali** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
6. **Pollock, Duncan** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
7. **Routhier, Richard** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
8. **Hessel, Amir** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
9. **Kaufman, Alon** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
10. **Hatgis, Natalia** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition

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<sup>1</sup> In the event a witness is not available to testify live, his or her deposition testimony may be used.

11. **Kessell, Simon** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
12. **Wiener, Laurence** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition
13. **Wind, Michael** (live) – background, investments in Funds and damages; significance of PwC's audits to reinvestments and holding investments; and other topics from deposition

#### **PLAINTIFFS' EXPERTS**

14. **Carmichael, Douglas** (live) qualifications as per CV and deposition – expert testimony regarding the various ways in which PwC's audits failed to satisfy the applicable auditing standards; the role of an independent auditor of financial statements of investment funds and the significance of such audits
15. **Feinstein, Steven** (live) qualifications as per CV and deposition – expert testimony that certain trades tested by PwC contained impossible and nearly-impossible execution based on the prices reported by BLMIS and the supposed volume that PwC understood that BLMIS was trading
16. **Robert Lindquist** (live) qualifications as per CV and deposition – expert testimony that, based on the fraud risk factors known to PwC, a competently conducted investigation would have revealed that the trading information provided by BLMIS was inaccurate
17. **Leitner, Anthony** (live) qualifications as per CV and deposition – expert testimony that the information and documentation provided by BLMIS regarding its purported option trading on behalf of the Funds should have raised concerns and led to further investigation, including contact or verification with counterparties
18. **DeMario, Marianne** (live) qualifications as per CV and deposition – expert testimony regarding the “net equity” method of calculating damages; description of “purchaser damages” and holder damages” and how damages are calculated under each category
19. **Krys, Kenneth** (live) – testimony concerning the database of transactions in the Funds

#### **FAIRFIELD GREENWICH**

20. **Lipton, Dan** (live) – background information regarding Fairfield Funds and BLMIS; existence of fraud risk factors; retention of PwC as auditor; scope and importance of

PwC's engagement and expectation that PwC was confirming the existence of the Funds' assets; distribution of audit reports to shareholders; and other topics from deposition

- 21. Tucker, Jeffrey** (live) – background information regarding Fairfield Funds and BLMIS; existence of fraud risk factors; communications with investors; scope and importance of PwC's engagement and expectation that PwC was confirming the existence of the Funds' assets; and other topics from deposition
- 22. Noel, Walter** (live) – background information regarding Fairfield Funds and BLMIS; existence of fraud risk factors; scope and importance of PwC's engagement and expectation that PwC was confirming the existence of the Funds' assets; and other topics from deposition
- 23. Piedrahita, Andres** (live) – existence of fraud risk factors; scope and importance of PwC's engagement and expectation that PwC was confirming the existence of the Funds' assets; and other topics from deposition
- 24. Vijayvergiya, Amit** (may call) (live) – background information regarding Fairfield Funds and BLMIS; existence of fraud risk factors; communications with investors; scope and importance of PwC's engagement and expectation that PwC was confirming the existence of the Funds' assets; and other topics from deposition
- 25. Blum, Robert** (may call) (live) – background information regarding Fairfield Funds and BLMIS; existence of fraud risk factors; communications with investors; scope and importance of PwC's engagement and expectation that PwC was confirming the existence of the Funds' assets; and other topics from deposition
- 26. Zhang, Nancy** (may call) (live) – background information regarding Fairfield Funds and BLMIS; existence of fraud risk factors; communications with investors; scope and importance of PwC's engagement and expectation that PwC was confirming the existence of the Funds' assets; and other topics from deposition
- 27. McKeefry, Mark** (may call) (live) – background information regarding Fairfield Funds and BLMIS; existence of fraud risk factors; communications with investors; scope and importance of PwC's engagement and expectation that PwC was confirming the existence of the Funds' assets; and other topics from deposition
- 28. McKenzie, Gord** (may call) (live) – background information regarding Fairfield Funds and BLMIS; existence of fraud risk factors; communications with investors; scope and

importance of PwC's engagement and expectation that PwC was confirming the existence of the Funds' assets; and other topics from deposition

- 29. Dell'Arena, Anthony** (may call) (live) – background information regarding Fairfield Funds and BLMIS; existence of fraud risk factors; communications with investors; scope and importance of PwC's engagement and expectation that PwC was confirming the existence of the Funds' assets; and other topics from deposition

## CITCO

- 30. Meijer, Folgert (Ger-Jan)** (live) – concerns raised by the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by BLMIS; alternative audit procedures available to address the concerns raised by the Funds' structure; testimony regarding PwC's audits of the Funds; and other topics from deposition
- 31. Verhooren, John** (by deposition) – concerns raised regarding the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by BLMIS; communications of concerns with PwC, and reliance on professional performance of PwC; and other topics from deposition
- 32. Cova, Anuschka** (by deposition) – concerns raised regarding the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by BLMIS; frequency of interaction and communications of concerns with PwC, and reliance on professional performance of PwC; and other topics from deposition
- 33. Van Nijen, Albert** (by deposition) – concerns raised by the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by BLMIS; alternative audit procedures available to address the concerns raised by the Funds' structure; testimony regarding meetings with BLMIS and PwC; testimony regarding reliance on PwC's audits of the Funds; and other topics from deposition
- 34. Boonstra, Renger** (by deposition) – concerns raised by the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by BLMIS; knowledge of investment discretion exercised by BLMIS and representations made to Irish Stock Exchange; interactions between Citco and PwC in administration of the Funds; and other topics from deposition

- 35. Smeets, Christopher** (by deposition) – concerns raised by the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by BLMIS; testimony regarding PwC's audits of the Funds; and other topics from deposition
- 36. Van Zanten, Michel** (by deposition) – concerns raised by the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by BLMIS; alternative audit procedures available to address the concerns raised by the Funds' structure; testimony regarding PwC's audits of the Funds; testimony regarding involvement in meeting with BLMIS and PwC, among others, and related communications with PwC; and other topics from deposition
- 37. Ma, Viona** (may call) (by deposition) – concerns raised by the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by BLMIS; alternative audit procedures available to address the concerns raised by the Funds' structure; testimony regarding PwC's audits of the Funds, and professional communications between Citco and PwC in furtherance of PwC audits of the Funds; and other topics from deposition
- 38. Keunen, William** (may call) (by deposition) – concerns raised by the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by BLMIS; alternative audit procedures available to address the concerns raised by the Funds' structure; testimony regarding PwC's audits of the Funds, and communication of Citco concerns to PwC; and other topics from deposition
- 39. Lokhorst, Bert** (may call) (by deposition) – concerns raised by the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by BLMIS; alternative audit procedures available to address the concerns raised by the Funds' structure; testimony regarding PwC's audits of the Funds, and communication regarding same with Citco; propriety of third-party confirmation of Fund transactions; and other topics from deposition
- 40. Luckmann, Larry** (may call) (by deposition)– concerns raised by the structure of the Funds with BLMIS serving as trader, broker, and custodian leading to a lack of segregation and no independent verification of the financial information provided by

BLMIS; alternative audit procedures available to address the concerns raised by the Funds' structure; testimony regarding PwC's audits of the Funds; interactions with PwC in performing obligations; and other topics from deposition

### THIRD PARTIES

41. **Watson-Brown, Scott** (live) – testimony regarding the site visits to BLMIS; the planning and performance of audit procedures conducted by PwC Bermuda's audit team in connection with auditing the Kingate funds' financial statements; and other topics from deposition
42. **McGowan, Linda** (live) – testimony regarding the site visits to BLMIS and Friebling & Horowitz; and other topics from deposition
43. **Berman, Gil** (live) – testimony concerning his analysis of the purported trading on behalf of the Funds; and other topics from deposition
44. **Geigel, Susan** (live) – testimony regarding the Deposit Trust Company; and other topics from deposition

### PWC NETHERLANDS

45. **Smit, Gerrit** (live) – the initial engagement of PwC Netherlands to audit the financial statements of the Funds and provide audit opinions to the Funds' shareholders; the planning and performance of audit procedures conducted by PwC Netherland's audit team in connection with auditing the Funds' financial statements; and other topics from deposition
46. **Van Veen, Daniel** (live) – the planning and performance of audit procedures conducted by PwC Netherland's audit team in connection with auditing the Funds' financial statements; and other topics from deposition
47. **Villoria, Sylvie** (live) – the planning and performance of audit procedures conducted by PwC Netherland's audit team in connection with auditing the Funds' financial statements; and other topics from deposition
48. **Hartkamp, Eric** (live) – the planning and performance of audit procedures conducted by PwC Netherland's audit team in connection with auditing the Funds' financial statements
49. **Hage, Cornelius** (live) – the planning and performance of audit procedures conducted by PwC Netherland's audit team in connection with auditing the Funds' financial statements; and other topics from deposition

**50. Meijnders, Chris** (live) – the planning and performance of audit procedures conducted by PwC Netherland's audit team in connection with auditing the Funds' financial statements; and other topics from deposition

**51. Gertsen, Fred** (live) – the planning and performance of audit procedures conducted by PwC Netherland's audit team in connection with auditing the Funds' financial statements; and other topics from deposition

#### **PWC CANADA**

**52. Bergeron, Lisa** (live) – the planning and performance of audit procedures conducted by PwC Canada's audit team in connection with auditing the Funds' financial statements; and other topics from deposition

**53. Woo, Selene** (live) – the planning and performance of audit procedures conducted by PwC Canada's audit team in connection with auditing the Funds' financial statements; and other topics from deposition

**54. Luzadas, Jess** (live) – the planning and performance of audit procedures conducted by PwC Canada's audit team in connection with auditing the Funds' financial statements; and other topics from deposition

**55. Taylor, Robin** (live) – the planning and performance of risk analysis conducted by Dorothy Sanford and Robin Taylor; and other topics from deposition

**56. Sanford, Dorothy** (live) – the planning and performance of risk analysis conducted by Robin Taylor and Dorothy Sanford; and other topics from deposition

**57. Hatoum, Derek** (live) – the planning and performance of audit procedures conducted by PwC Canada's audit team in connection with auditing the Funds' financial statements; and other topics from deposition

**58. Perruzza, Patricia** (live) – the planning and performance of audit procedures conducted by PwC Canada's audit team in connection with auditing the Funds' financial statements; and other topics from deposition

**59. Wall, Stephen** (live) – the planning and performance of audit procedures conducted by PwC Canada's audit team in connection with auditing the Funds' financial statements; and other topics from deposition