

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

EOLAS TECHNOLOGIES, INC.,

§

Plaintiff,

§

§

v.

§

No. 6:09-cv-00446-LED

§

ADOBE SYSTEMS, INC., et al.,

§

§

Defendants.

§

§

CITIGROUP INC.’S IDENTIFICATION OF REBUTTAL TRIAL WITNESSES

Defendant Citigroup Inc. (“Citigroup”) expects to call the following witnesses to testify by live testimony at trial:

1. Chuck Easttom
2. Rebuttal expert witness on issues relating to damages, to be identified by

Citigroup in accordance with the Court’s Docket Control Order as amended.

Defendant Citigroup further identifies the following witnesses it may call to testify by live testimony at trial as needed:

3. Rebuttal witness(es) on infringement as identified by other defendants in accordance with the Court’s Docket Control Order
4. Rebuttal witness(es) on damages as identified by other defendants in accordance with the Court’s Docket Control Order.

Defendant Citigroup further identifies the following witnesses it may call to testify by live testimony at trial as needed, depending upon Plaintiff’s arguments relating to web analytics:

5. Barry Truhn

6. Daniel Arnstein
7. Michael Wexler

Citigroup reserves the right to supplement this document as discovery is ongoing.

August 22, 2011

Respectfully submitted:

/s/ M. Scott Fuller
Edwin R. DeYoung
Texas Bar No. 05673000
Roy W. Hardin
Texas Bar No. 08968300
Roger Brian Cowie
Texas Bar No. 00783886
M. Scott Fuller
Texas Bar No. 24036607
Galyn Gafford
Texas Bar No. 24040938
LOCKE LORD BISSELL & LIDDELL LLP
2200 Ross Avenue, Suite 2200
Dallas, Texas 75201-6776
Telephone: (214) 740-8000
Facsimile: (214) 740-8800
E-mail: edeyoung@lockelord.com

**ATTORNEYS FOR DEFENDANT
CITIGROUP INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that on the 22nd day of August, 2011, the foregoing document was served on Plaintiff's counsel of record via electronic mail in compliance with Local Rule CV-5(d).

/s/ M. Scott Fuller