

**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 TRIAL WITNESSES

Defendant Citigroup Inc. (“Citigroup”) may call the following persons as witnesses at trial either live or by deposition:

A. Fact Witnesses

1. Don Parsons
2. Paul Chalifoux
3. Vanessa Colella
4. Leigh Jacobson
5. Witness to be determined to testify as to web analytics tracked by Omniture
6. Witness to be determined to testify as to web analytics tracked by WebTrends
7. Pei Wei
8. Scott Silvey
9. Karl Jacob
10. Bill Janssen
11. Dave Raggett

B. Expert Witnesses

1. Nick Godici

2. Richard Phillips
3. Rebuttal witness(es) on infringement as identified by Citigroup and its co-defendants in accordance with the Court's Docket Control Order
4. Rebuttal witness(es) on damages as identified by Citigroup and its co-defendants in accordance with the Court's Docket Control Order

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

August 12, 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 12th 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/ Galyn Gafford