

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

DELIVERANCE POKER, LLC,  
Plaintiff,

v.

MICHAEL MIZRACHI and  
TILTWARE, LLC,  
Defendant

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CIVIL ACTION NO. 1:10-CV-00664-JRN

**PLAINTIFF'S DESIGNATION OF POTENTIAL WITNESSES, TESTIFYING  
EXPERTS, AND PROPOSED EXHIBITS**

Plaintiff Deliverance Poker, LLC ("Deliverance Poker") files its designation of potential witnesses, testifying experts, and proposed exhibits.<sup>1</sup>

**Potential Fact Witnesses**

1. Carlos Y. Benavides, III
2. Michael Mizrachi
3. Maurice Mills
4. Christopher Cosenza
5. Peter Beshay
6. Reynaldo Jay Perales
7. Chris Porter

**Testifying Experts**

1. Carlos Y. Benavides, III
2. Maurice Mills

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<sup>1</sup> Plaintiff filed today a second motion to compel discovery responses due to Defendants Michael Mizrachi and Tiltware, LLC to provide complete responses to discovery requests. Plaintiff has been severely hampered in preparing its designations due to Defendants' lack of cooperation in discovery, but Plaintiff anticipates that it will supplement these designations promptly upon receipt of discovery from Defendants.

3. Gary Wilcox, Ph.D.
4. Reynaldo Jay Perales
5. Douglas M. Becker
6. John D. Jacks

**Proposed Exhibits**

1. Promotional Representation Agreement signed by Michael Mizrachi (DP001 to 006)
2. Promotional Representation Agreement signed by Robert Mizrachi (DP007 to 0012)
3. Promotional Representation Agreement signed by Eric Mizrachi (DP0013 to 0018)
4. Promotional Representation Agreement signed by Daniel Mizrachi (DP 0019 to 0024)
5. License Agreement between Sabre Asset Management, S.A. and Deliverance Poker, LLC (DP0025 to 0035)
6. Full Tilt Poker website page (DP0055)
7. Photos of Michael Mizrachi (DP0071 to 0082, DP0379 to 0382)
8. Website pages from Deliverance Poker (DP0083 to 0085)
9. Ante Up Magazine online article (DP0086 to 0090)
10. YouTube Video of Michael Mizrachi (see DP0097)
11. Website pages from Michael Mizrachi website (DP0109 to 0116)
12. CardPlayer News Release (DP00117)
13. Report and Exhibits prepared by Gary Wilcox, Ph.D. and supporting material (DP0162 to 0176 and DP0184 to 0324)
14. Curriculum vitae of Gary Wilcox, Ph.D. (DP0177 to 0183)
15. Website pages from Michael Mizrachi website (DP0331 to 0339)
16. Website pages from Full Tilt Poker (DP0340 to 0343)
17. Website pages from The Hendon Mob (DP0344 to 0353)

18. Website pages from grindersapp (DP0354 to 0355)
19. Website page from north88outdoor (DP0356)
20. Website page from Royal Pain Clothign (DP0357)
21. Website page from Smoke51 (DP0358)
22. Website pages from Southwest Jewelry Buyers (DP0359 to 0362)
23. Website page from gotRAFFLE (DP0363)
24. Website pages from Michael Mizrachi Face Book (DP0364 to 0368)
25. Website pages from Michael Mizrachi Twitter (DP 0369 to 0372)
26. Website pages from The Grinder Knot (DP0373 to 0378)
27. Card Player Magazine, August 2010 (DP0383 to 0394)
28. 2010 World Series of Poker Tournament Rules (DP0395 to 0402)
29. Douglas M. Becker biography (DP0403)
30. John D. Jacks biography (DP0404)

Respectfully submitted,

By: /s/ Douglas M. Becker

**Douglas M. Becker**

Texas State Bar No. 02012900

**John D. Jacks**

Texas State Bar No. 00785986

**GRAY & BECKER, P.C.**

900 West Avenue

Austin, Texas 78701

Telephone: (512) 482-0061

Facsimile: (512) 482-0924

**COUNSEL FOR PLAINTIFF**

**DELIVERANCE POKER, LLC**

**CERTIFICATE OF SERVICE**

I certify that on 3/1/2011, I caused Plaintiff's Designation of Potential Witnesses, Testifying Experts and Proposed Exhibits to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following counsel for Defendants Michael Mizrachi and Tiltware, LLC:

John P. Henry  
The Law Offices of John Henry, P.C.  
P.O. Box 1838  
Round Rock, Texas 78680

/s/ John D. Jacks  
John D. Jacks