

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

DELIVERANCE POKER, LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 1:10-CV-00664-JRN
	§	
MICHAEL MIZRACHI and	§	
TILTWARE, LLC,	§	
	§	
Defendants.	§	

**DEFENDANTS MICHAEL MIZRACHI AND TILTWARE, LLC’S DESIGNATION OF  
POTENTIAL WITNESSES AND PROPOSED EXHIBITS**

Defendants Michael Mizrachi and Tiltware, LLC (“Defendants”) file this designation of potential witnesses and proposed exhibits. Plaintiff has not yet produced documents responsive to Defendants’ discovery requests and continues to supplement its disclosure responses; therefore, Defendants will supplement these designations once the additional discovery is produced.

**POTENTIAL FACT WITNESSES**

1. Carlos Y. Benavides, III
2. Michael Mizrachi
3. Maurice Mills
4. Peter Beshay
5. Reynaldo Jay Perales
6. Chris Porter
7. Lilly Mizrachi
8. Eric Mizrachi
9. Robert Mizrachi
10. Daniel Mizrachi
11. Chris Torina
12. Alexander Awasthi
13. Barry Schnell

14. Donna Marks
15. Patrick Phipps
16. Scott Broderhausen
17. Aaron Copeland
18. Stuart Catlin
19. Efren Saldivar
20. Bob Wolf

### **POTENTIAL EXPERT WITNESSES**

1. Bob Wolf
2. Dale Timmons
3. Irtiza Arain
4. Mike Matassa
5. Eric Shirk

### **PROPOSED EXHIBITS**

1. Promotional Representation Agreement between Michael Mizrachi and Deliverance (DP0001 to 0006).
2. Promotional Representation Agreement between Robert Mizrachi and Deliverance (DP0007 to 0012).
3. Promotional Representation Agreement between Eric Mizrachi and Deliverance (DP0013 to 0018).
4. Promotional Representation Agreement between Daniel Mizrachi and Deliverance (DP0007 to 0012).
5. License Agreement between Sabre Asset Management, S.A. and Deliverance (DP0025 to 0035).
6. Website pages from Deliverance (DP0083 to 0085).
7. Report and Exhibits prepared by Gary Wilcox and supporting material (DP0162 to 0176, 0184 to 0324).
8. Curriculum Vitae of Gary Wilcox (DP0177 to 0183).
9. 2010 World Series of Poker Tournament Rules (DP0395 to 0402).
10. Douglas M. Becker biography (DP0403).
11. John D. Jacks biography (DP0404).

12. Text message from Benavides to Mizrachi, produced with Mizrachi's disclosures.
13. Email from Chris Torina to Ian Imrich, produced with Mizrachi's disclosures.
14. License Agreement between AM Holdings, LLC and Deliverance, (DP0036 to 0046).
15. Promissory Note between AM Holdings, LLC and Deliverance (DP0047 to 0050).
16. License Agreement between Sabre Asset Management, S.A. and Deliverance (DP0098 to 0108).
17. Report and Curriculum Vitae of Bob Wolf, produced with Tiltware's expert designations.
18. Report and Curriculum Vitae of Dale Timmons, produced with Tiltware's expert designations.
19. Report and Curriculum Vitae of Irtiza Arain, produced with Tiltware's expert designations.
20. Report and Curriculum Vitae of Mike Matassa, produced with Tiltware's expert designations.
21. Report and Curriculum Vitae of Eric Shirk, produced with Tiltware's expert designations.

Respectfully submitted,

/s/ John P. Henry \_\_\_\_\_

John P. Henry

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**Attorneys for Defendants Mizrachi and  
Tiltware, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of March, 2011, I caused the foregoing Document to be delivered via ECF or facsimile to the following parties, through their attorney of record:

/s/ John P. Henry \_\_\_\_\_  
John P. Henry

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