

# **EXHIBIT A**

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 SECOND SUPPLEMENTAL DISCLOSURES**

Plaintiff Deliverance Poker, LLC submits the following second supplemental disclosures under Federal Rule of Civil Procedure 26.

Respectfully submitted,

By: /s/ Douglas M. Becker

**Douglas M. Becker**  
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**COUNSEL FOR PLAINTIFF  
DELIVERANCE POKER, LLC**

**PLAINTIFF'S SECOND SUPPLEMENTAL DISCLOSURES**

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Aaron Copeland  
 Stuart Catlin  
 Efrén Saldívar  
 The Denim Group  
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 (210) 572-4400  
 Individuals with knowledge of evaluation of RealDeck software.

(ii) A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Plaintiff previously provided documents Bates numbered DP00001 to DP000436, plus the link to the following website: <http://demos.thisisboss.com/dp/intro>. In addition, Plaintiff provides documents Bates numbered DP000437 to DP001035.

(iii) A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

In addition, to Plaintiff's Initial Disclosures, Plaintiff also previously provided the written report of Gary Wilcox, Ph.D., with his supporting materials. See DP000162 to DP00324.

**CERTIFICATE OF SERVICE**

I certify that on 3/14/2011, a true and correct copy of Plaintiff's Second Supplemental Initial Disclosures was emailed and faxed to the following counsel:

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/s/ John D. Jacks  
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