

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

VERISIGN, INC.,

Plaintiff,

v.

XYZ.COM, LLC

-and-

DANIEL NEGARI,

Defendants.

Case No. 1:14-cv-01749-CMH-MSN

VERISIGN'S LIST OF TRIAL WITNESSES

Plaintiff VeriSign, Inc. ("Verisign"), by and through its undersigned counsel, and pursuant to the Court's Scheduling Order, respectfully submits the following disclosure of witnesses who Plaintiff intends to call to testify at the trial in this matter, and those witnesses who may be called should the need arise ("Witness List").

By way of further disclosure, Plaintiff respectfully states as follows:

1. Plaintiff reserves the right to call as a witness at trial any person identified on the Defendants' witness list, either live or by deposition testimony.
2. Plaintiff reserves the right to amend this witness list, including to identify additional witnesses, in the event that Defendants' counsel is permitted to amend their witness list, or in the event that any ruling by the Court or other development justifies amendment.
3. Plaintiff reserves the right to call authenticity witnesses not listed herein to the extent that Defendants object to the authenticity of Plaintiff's exhibits.

4. Plaintiff reserves the right to call rebuttal expert and fact witnesses based on the evidence adduced at trial.

5. Plaintiff generally reserves the right to supplement or amend its witness list due to changes in the issues to be tried, the results of any remaining motions practice or discovery, and otherwise as may be necessary or appropriate.

6. If Defendants introduce any expert opinion in their case, Plaintiff reserves the right to respond with an expert in rebuttal.

7. Plaintiff expects to present the following witnesses at trial, either live or by deposition testimony. The parties have agreed in writing to exchange line and page designations for depositions by August 28, 2015.

- a. Scott Schnell (Verisign, can be contacted through Venable)
- b. Pat Kane (Verisign, can be contacted through Venable)
- c. Andrew Simpson (Verisign, can be contacted through Venable)
- d. Daniel Negari (Defendant)
- e. Michael Mazis (Plaintiff expert)
- f. Mark Berenblut (Plaintiff expert)
- g. Lauren Kindler (Plaintiff expert)
- h. Michael Ambrose (agent of Defendant XYZ)
- i. Steven Ambrose (agent of Defendant XYZ)
- j. Holden Andrews (agent of Defendant XYZ)
- k. Andrew Brewer (agent of Defendant XYZ)
- l. Grant Carpenter (agent of Defendant XYZ)
- m. Shayan Rostam (agent of Defendant XYZ)

- n. Alyssa Yoneyama (agent of Defendant XYZ)
- o. XYZ via its 30(b)(6) deposition
- p. Jason Teichman and/or Additional Representative of Web.com and its registrar Network Solutions (contacted via counsel for Web.com Jason Koral of Cooley Godward)
- q. Representative of Ernst & Young, Auditor to Web.com (contacted via E&Y's office of general counsel, 1101 New York Avenue NW, Washington, DC 20005)
- r. Akram Atallah and/or other representative of ICANN (contacted via counsel for ICANN Jeffrey LeVee of Jones Day)
- s. Representative of Elias Aziz-Lavi CPA (accountant to Defendants, contacted through defense counsel)
- t. Thies Lindenthal (defense expert)

8. Plaintiff may, if the need arises, present the following witnesses at the hearing, either live or by deposition testimony:

- a. Craig Snyder (12718 56TH PL W, Mukilteo, WA 98275-5524)
- b. Mrinal Sign (Verisign, can be contacted through Venable)
- c. Representative of .CLUB (.Club Domains, LLC, 100 SE 3rd Avenue #1310, Fort Lauderdale, FL, 33394 USA)
- d. Jonathan Frakes (defense expert)
- e. Sam Hewitt (defense expert)
- f. Hal Poret (defense expert)
- g. Joseph Waldron, (Verisign, can be contacted through Venable)

- h. Berta Negari (Defendant Negari's Mother and business partner) (contacted through defense counsel)
- i. Ben Crawford or other representative from Centralnic (CentralNic Ltd., 35-39 Moorgate, London, EC2R 6AR, Tel: +44 (0)20 33 88 0600)
- j. Representative of Goodwill (regarding Negari pattern of conduct) (through counsel in matter identified in Complaint)
- k. Representative of Facebook (regarding Negari pattern of conduct) (through counsel in matter identified in Complaint)
- l. Michael Crews Gore (1450 Hague Drive SW Leesburg, VA 20175, 703-635-9742)

Dated: August 20, 2015

VENABLE LLP

/s/

Randall K. Miller (VSB No. 70672)
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Counsel to Plaintiff VeriSign, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of August, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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