UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LYNDON H. LAROUCHE, JR., EDWARD :
SPANNAUS, ELIJAH BOYD, JR., DANIEL
SNEIDER, ALAN SALISBURY, KHUSHRO :
GHANDHI, ANITA GRETA GALLAGHER,
ANTON CHAITKIN, IRA LIEBOWITZ, NANCY :
BRADEEN SPANNAUS, MARIA SPIDA,

BRADEEN SPANNAUS, MARIA SPIDA,
MICHAEL R. MICHALESON, CRAIG SCHULTZ, :

GAIL GOERNER KAY, THE UNITED STATES
LABOR PARTY and THE NATIONAL CAUCUS:
OF LABOR COMMITTEES,

Plaintiffs,

- v -

LOUIS J. FREEH, JANET RENO, and the : FEDERAL BUREAU OF INVESTIGATION,

Defendants.

DEFENDANTS' REVISED WITNESS LIST

Louis J. Freeh, Janet Reno and the Federal Bureau of Investigation ("FBI"), collectively "defendants", identify the following persons that defendants will or may call to testify at trial in this action, and the following exhibits that defendants expect to offer or may offer at trial if the need arises.

A. Witness List

James B. Adams

Gerard B. Alexander

Gus Axios aka Konstandinos Kalimtigis

Amiri Baraka

Steven Bardwell

Michael Barkin

Christine Berl

75 Civ. 6010 (TPG)

Chip Berlet

Gail Goerner Billington

Elijah Boyd, Jr. aka Zeke Boyd

John D. Brady

Anton Chaitkin

Kevin Coogan

Christian Curtis

Paul V. Daly

Jodi Dean

Joseph G. Deegan

Robert Dillon

John P. DiMarchi

Steven Fraser

Anita Gretz Gallagher

James W. Gerblick

Paul Goldstein

David Hammond

Dan P. Harelson

William Hargreaves

Nat Hentoff

Wayne Hintz

John C. Holroyd

Irving Louis Horowitz

John Hotis

George Johnson

William T. Jones

Richard T. Kane

William C. Kash

Robert Kay

Thomas Kelley

James J. Kinney

Paul Kurz

Lyndon LaRouche, Jr. aka Lyn Marcus

Henry P. Latani

Roxanne Lee

Mordecai Levy

Patricia Lynch

James E. McGuigan

Thomas McNiff

Robert W. Meyers, Jr.

John Minogue

John Mintz

Graham S. Morgan

Emil Moschella

M. Hatcher Norris

Tony Papert

Leonard Pedreira

Vincent Plumpton, Jr.

Daniel Pipes

Uri Ra'anan

Steven E. Rayfield

Robert S. Robins

John W. Robinson

Gregory Rose

Andrew Rotstein

Mark Rudd

Harold Schlechtweg

Helen L. Schumaker

Randall C. Scott

Robert L. Shackelford

Joseph L. Sheridan, Jr.

Ray G. Shue

Kenneth K. Smythe

Edward Spannaus

Nancy Spannaus

Mark D. Stahlman

Jeffrey Steinberg

Michelle Steinberg

Rasheed Storey

Jose Torres

Vernon Thornton

Thomas E. Vornberger

W. Raymond Wannall

Alice Weitzman

Christopher White

James Whitenight

Robert E. Zinn

Martial arts expert (demonstration only)

Current NCLC member(s)

FBI custodian(s) of documents

Defendants reserve the right to call any person(s) identified on plaintiffs' witness list. In addition, defendants reserve the right to identify additional witnesses, including witnesses who will testify at trial in order to rebut evidence offered by plaintiffs on their direct case. Further, the fact that defendants list a particular witness on their witness list does not mean that defendants agree that specific testimony is admissible.

Dated: New York, New York July 24, 2000

MARY JO WHITE
United States Attorney for the
Southern District of New York
Attorney for Defendants

Bv

SHEILA M. GOWAN (SG: 8201) GLENN C. COLTON (GC: 2493) MARLA ALHADEFF (MA: 0335)

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New York, New York 10007 Tel.: (212) 637-2697

TO: Odin P. Anderson, Esq.
Anderson & Associates, P.C.
Four Longfellow Place, Suite 3705
Boston, MA 02114

Certificate of Service

I, SHEILA M. GOWAN, Assistant United States Attorney for the Southern District of New York, hereby certify that on the 24th day of July, 2000, I caused the service of a true copy of the foregoing defendants' revised witness list by facsimile and regular mail upon counsel for the plaintiffs addressed as follows:

Odin P. Anderson, Esq. Anderson, Rossi & Davis, P.C. Four Longfellow Place, Suite 3705 Boston, MA 02114

Dated:

New York, New York July 24, 2000

SHEILA M. GOWAN

Assistant United States Attorney

Tel. No.: (212) 637-2697