

EXHIBIT A
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20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

22
23 ALEX MORGAN, et al.,
24 Plaintiffs/Claimants,

25 v.

26 UNITED STATES SOCCER
27 FEDERATION, INC.,
28 USSF/Respondent.

Case No. 2:19-cv-01717-RGK-AGR

JOINT WITNESS LIST

Discovery Cutoff: February 6, 2020
Pre-trial Conference: April 20, 2020
Trial: May 5, 2020

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A), Local Rule 16-5 of the Central District of California, and this Court’s Order for Jury Trial (Dkt. No. 60), plaintiffs Alex Morgan, et al. (collectively, “Plaintiffs”) and Defendant United States Soccer Federation, Inc. (“U.S. Soccer” or “USSF”), hereby submit the following list of witnesses who may be called to testify at trial in this matter.

I. Plaintiffs’ Witness List

This list identifies the witnesses whom Plaintiffs intend to call, or may call, at trial, exclusive of any witnesses whom may be called for rebuttal or impeachment. Plaintiffs reserve the right to call any witness on Defendant USSF’s witness list, if those witnesses are not in fact called by USSF. Plaintiffs expressly reserve the right to supplement this list at any time before trial, and the right to object to any supplemental witnesses identified by USSF. Plaintiffs further reserve the right to call or refrain from calling any of the witnesses on this list.

U.S. Soccer notes that it seeks to exclude Plaintiffs’ expert witnesses Cook and Goldberg (listed in the below chart) for the reasons stated in U.S. Soccer’s motions *in limine* Nos. 3 and 5.

Witness Name/Address	Brief Statement of Testimony	Time Estimate
Alex Morgan c/o Jeffrey Kessler Winston & Strawn LLP 200 Park Avenue New York, NY 10166 Tel.: (212) 294-6700	Alex Morgan is a plaintiff class member and also one of four class representatives. Of the four class representatives, she has been employed as a soccer player by USSF for the shortest period of time, since 2010. In 2017, Ms. Morgan played soccer on loan to the French soccer club Lyon. Ms. Morgan serves on the Collective Bargaining Committee, Medical Committee, and NWSL Committee for the United States Women’s National	<i>Live Witness</i> Plaintiffs: 1.25 hours USSF: 1.25 hours This witness appears in both Plaintiffs’ list and USSF’s list. The times listed in Plaintiffs’ list cover the total time expected for the

Witness Name/Address	Brief Statement of Testimony	Time Estimate
	<p>Team Players Association (“WNTPA”). Ms. Morgan participated in collective bargaining negotiations with USSF in November 2015 and December 2016.</p> <p>Ms. Morgan will testify about the collective bargaining negotiations between USSF and the union for the U.S. Senior Women’s National Soccer Team (“WNT”) that she attended; the terms of the WNTPA’s collective bargaining agreements with USSF; the WNT’s working conditions, including mode of transportation to and from games (and the benefits and negatives of each option) and field surfaces for WNT matches (and the benefits of a grass field surface versus an artificial turf surface); a WNT player’s job responsibilities; compensation from USSF for WNT play; USSF’s treatment of the WNT; and facts evidencing USSF’s intent to discriminate.</p>	<p>witness’s testimony at trial.</p>
Christen Press ¹	Christen Press is a plaintiff class	<i>Live Witness</i>

¹ Plaintiff class member Alex Morgan may be unavailable at trial because of her pregnancy, and in the event that Ms. Morgan is unable to attend trial, Plaintiffs intend to call Christen Press in her place. Plaintiffs do not intend to call both Ms. Morgan and

Witness Name/Address	Brief Statement of Testimony	Time Estimate
<p>c/o Jeffrey Kessler Winston & Strawn LLP 200 Park Avenue New York, NY 10166 Tel.: (212) 294-6700</p>	<p>member. She is not a class representative. Ms. Press has been employed as a soccer player by USSF since 2012.</p> <p>Ms. Press served as a player representative for the WNTPA during collective bargaining with USSF over the 2017-2021 WNT collective bargaining agreement. She attended collective bargaining negotiations and discussions in December 2016 (including one meeting where the only class representative present was Ms. Morgan) and February 2017. Unlike the four class representatives, Ms. Press did not file an EEOC Charge of Discrimination against USSF in 2016.</p> <p>If called, Ms. Press will testify about the WNTPA’s collective bargaining negotiations with USSF that she attended; the terms of the WNTPA’s collective bargaining agreements with USSF; the WNT’s working conditions, including mode of transportation to and from games and field surfaces for WNT matches; a WNT player’s job responsibilities; compensation from USSF for WNT play; USSF’s treatment of the WNT; facts evidencing USSF’s intent to discriminate, including specific discriminatory statements made by USSF negotiators during negotiations; and the WNT players’ use of “equitable” during negotiations over the 2017-2021 WNT collective</p>	<p>Plaintiffs: 1.25 hours</p> <p>USSF: 0.75 hours</p> <p>This witness appears in both Plaintiffs’ list and USSF’s list. The times listed in Plaintiffs’ list cover the total time expected for the witness’s testimony at trial.</p>

Ms. Press as witnesses.

Witness Name/Address	Brief Statement of Testimony	Time Estimate
<p>Megan Rapinoe c/o Jeffrey Kessler Winston & Strawn LLP 200 Park Avenue New York, NY 10166 Tel.: (212) 294-6700</p>	<p>bargaining agreement.</p> <p>Megan Rapinoe is a plaintiff class member and also one of four class representatives. She has been employed as a soccer player by USSF since 2006.</p> <p>Ms. Rapinoe previously served on the Collective Bargaining Committee and Commercial Committee for the WNTPA. Ms. Rapinoe attended collective bargaining negotiations in February 2016, March 2016, June 2016, February 2017, and April 2017.</p> <p>In 2007 and 2008, Ms. Rapinoe suffered two significant knee injuries that prevented her from training or playing with the WNT.</p> <p>Ms. Rapinoe will testify about the WNTPA's collective bargaining negotiations with USSF that she attended; the terms of the WNTPA's collective bargaining agreements with USSF; the WNT's working conditions, including mode of transportation to and from games and field surfaces for WNT matches; a WNT player's job responsibilities; compensation from USSF for WNT play; USSF's treatment of the WNT; and facts evidencing USSF's intent to discriminate, including specific discriminatory statements made by USSF negotiators during negotiations.</p>	<p><i>Live Witness</i></p> <p>Plaintiffs: 1.25 hours</p> <p>USSF: 1.25 hours</p>
<p>Carli Lloyd c/o Jeffrey Kessler Winston & Strawn LLP</p>	<p>Carli Lloyd is a plaintiff class member and also one of four class representatives. Of the four class</p>	<p><i>Live Witness</i></p> <p>Plaintiffs: 1.25 hours</p>

Witness Name/Address	Brief Statement of Testimony	Time Estimate
<p>200 Park Avenue New York, NY 10166 Tel.: (212) 294-6700</p>	<p>representatives, she has been employed as a soccer player by USSF for the longest period of time, since 2005.</p> <p>Ms. Lloyd serves on the NWSL committee for the WNTPA and has not served on any other committee for the WNTPA.</p> <p>Ms. Lloyd will testify about the WNTPA's collective bargaining negotiations with USSF that she attended; the terms of the WNTPA's collective bargaining agreements with USSF; the WNT's working conditions, including mode of transportation to and from games and field surfaces for WNT matches; a WNT player's job responsibilities; compensation from USSF for WNT play; USSF's treatment of the WNT; and facts evidencing USSF's intent to discriminate.</p>	<p>USSF: 1.25 hours</p>
<p>Becky Sauerbrunn c/o Jeffrey Kessler Winston & Strawn LLP 200 Park Avenue New York, NY 10166 Tel.: (212) 294-6700</p>	<p>Becky Sauerbrunn is a plaintiff class member and also one of four class representatives. She has been employed as a soccer player by USSF since 2008.</p> <p>Ms. Sauerbrunn attended several collective bargaining negotiations culminating in the execution of the WNTPA's 2017-2021 collective bargaining agreement with USSF.</p> <p>Ms. Sauerbrunn is a player representative for the WNTPA.</p> <p>Ms. Sauerbrunn will testify about the</p>	<p><i>Live Witness</i></p> <p>Plaintiffs: 2.5 hours</p> <p>USSF: 1.25 hours</p>

Witness Name/Address	Brief Statement of Testimony	Time Estimate
	<p>WNTPA’s collective bargaining negotiations with USSF that she attended; the terms of the WNTPA’s collective bargaining agreements with USSF; the WNT’s working conditions, including mode of transportation to and from games and field surfaces for WNT matches; a WNT player’s job responsibilities; compensation from USSF for WNT play; USSF’s treatment of the WNT; and facts evidencing USSF’s intent to discriminate.</p>	
<p>Dr. Finnie Cook c/o Jeffrey Kessler Winston & Strawn LLP 200 Park Avenue New York, NY 10166 Tel.: (212) 294-6700</p>	<p>Dr. Cook is an economist who conducts economic analyses of lost wages and benefits. She is Plaintiffs’ damages expert.</p> <p>Dr. Cook will testify on the backpay damages suffered by plaintiff members of the Equal Pay Act and Title VII classes, and the corresponding pre-judgment interest and liquidated damages also due.</p>	<p><i>Live Witness</i> Plaintiffs: 3 hours USSF: 2.0 hours</p>
<p>Dr. Caren Goldberg c/o Jeffrey Kessler Winston & Strawn LLP 200 Park Avenue New York, NY 10166</p>	<p>Dr. Goldberg is a professor of human resource management and an expert in this field. She is Plaintiffs’ human resources expert.</p>	<p><i>Live Witness</i> Plaintiffs: 3 hours USSF: 2.0</p>

Witness Name/Address	Brief Statement of Testimony	Time Estimate
<p>Tel.: (212) 294-6700</p>	<p>Dr. Goldberg will testify on whether USSF’s human resource practices fell below standard and acceptable human resource practice with respect to USSF’s treatment of WNT players in connection with various aspects of their employment with USSF, including their working conditions and complaints of unequal and/or discriminatory treatment.</p>	<p>hours</p>
<p>Dr. Roger Noll*² c/o Jeffrey Kessler Winston & Strawn LLP 200 Park Avenue New York, NY 10166 Tel.: (212) 294-6700</p>	<p>Dr. Noll is an economist and a professor of economics. He is Plaintiffs’ rebuttal expert.</p> <p>Dr. Noll will rebut testimony from Ms. Irwin regarding revenue generated by the WNT and the U.S. Senior Men’s National Soccer Team (“MNT”), respectively, and whether revenue differences could justify differences in compensation for the two teams. He will also rebut the testimony of USSF’s expert, Dr. Justin McCrary, who is expected to testify on whether WNT players receive a lower rate of pay under their collective bargaining agreement compared to what MNT players are compensated under their collective bargaining agreement with USSF. Dr. Noll will also rebut</p>	<p><i>Live Witness</i></p> <p>Plaintiffs: 2 hours</p> <p>USSF: 1.50 hours</p>

² Plaintiffs may call Dr. Noll on rebuttal depending on the outcome of their *Daubert* motion and motion *in limine* on USSF’s expert testimony. See Dkt. Nos. 167 and 216.

Witness Name/Address	Brief Statement of Testimony	Time Estimate
	testimony from Dr. McCrary regarding whether economic risk in the WNT's and MNT's collective bargaining agreements makes the two agreements incomparable.	
United States Soccer Federation through 30(b)(6) Designees Jay Berhalter, Sunil Gulati, and Tom King c/o Brian Stolzenbach Seyfarth Shaw LLP 233 S. Wacker Drive Suite 8000 Chicago, IL 60606 Tel.: (312) 460-5551	USSF's 30(b)(6) testimony will cover the differences between the terms of the relevant collective bargaining agreements between the MNT and USSF and the WNT and USSF and the negotiations of the collective bargaining agreements. The 30(b)(6) testimony will also cover USSF's finances, revenues, budgeting, and marketing and sponsorship issues. It will also cover USSF's organizational structure, operations of the MNT and WNT, and its decisions regarding the treatment of the MNT and WNT, including playing surfaces on which both the MNT and WNT play and the hotel and travel arrangements for each team.	<i>By Deposition Video</i> Plaintiffs: 5 hours USSF: 3.0 hours
Sunil Gulati c/o Brian Stolzenbach Seyfarth Shaw LLP 233 S. Wacker Drive Suite 8000 Chicago, IL 60606 Tel.: (312) 460-5551	Mr. Gulati is the former President of USSF. He serves on USSF's board of directors. Mr. Gulati will testify on revenues generated by the WNT and the MNT for USSF, and whether these revenue	<i>Live or by Deposition Video</i> Plaintiffs: 3 hours

Witness Name/Address	Brief Statement of Testimony	Time Estimate
	<p>figures were the basis for the alleged pay differential between WNT players and MNT players. He will also testify on USSF's responses to and policies on complaints of discrimination. He will also testify on USSF's collective bargaining negotiations with WNT players.</p>	<p>USSF: 4.0 hours</p> <p>This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's testimony at trial.</p>
<p>Jay Berhalter c/o Brian Stolzenbach Seyfarth Shaw LLP 233 S. Wacker Drive Suite 8000 Chicago, IL 60606 Tel.: (312) 460-5551</p>	<p>Mr. Berhalter is the former Chief Commercial Officer of USSF. He resigned from this position in February 2020.</p> <p>Mr. Berhalter will testify on the economic values to USSF of the WNT's and MNT's respective contributions; the marketing and promotion of the WNT and the MNT; USSF's sponsorship agreements relating to the WNT and the MNT; USSF's policies and practices with respect to the WNT and the MNT; the respective job duties of WNT and MNT players; and USSF's relationship with the National Women's Soccer League.</p>	<p><i>Live or by Deposition Video</i></p> <p>Plaintiffs: 1 hour</p> <p>USSF: 1.50 hours</p>
<p>Carlos Cordeiro c/o Brian Stolzenbach Seyfarth Shaw LLP 233 S. Wacker Drive Suite 8000 Chicago, IL 60606 Tel.: (312) 460-5551</p>	<p>Mr. Cordeiro is the President of USSF and he also serves on USSF's board of directors.</p> <p>Mr. Cordeiro will testify on whether he or any other USSF board members have raised the issue of whether WNT</p>	<p><i>Live or by Deposition Video</i></p> <p>Plaintiffs: 2 hours</p>

Witness Name/Address	Brief Statement of Testimony	Time Estimate
	<p>players are not treated equally with MNT players. He will also testify on USSF's policies and practices for complying with the Equal Pay Act and Title VII. He will also testify on the process of preparing WNT and MNT team budgets.</p>	<p>USSF: 1.25 hours</p>
<p>Tom King c/o Brian Stolzenbach Seyfarth Shaw LLP 233 S. Wacker Drive Suite 8000 Chicago, IL 60606 Tel.: (312) 460-5551</p>	<p>Mr. King is USSF's Managing Director of Administration.</p> <p>Mr. King will testify on the terms and application of the MNT union's and WNTPA's respective collective bargaining agreements with USSF, including any differences between these agreements on compensation and other terms contained therein. He will also testify on the administration of the WNT and the MNT, including with respect to hotel and travel accommodations.</p>	<p><i>Live or by Deposition Video</i></p> <p>Plaintiffs: 3 hours</p> <p>USSF: 4.50 hours</p> <p>This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's testimony at trial.</p>
<p>Pinky Raina c/o Brian Stolzenbach Seyfarth Shaw LLP 233 S. Wacker Drive Suite 8000 Chicago, IL 60606 Tel.: (312) 460-5551</p>	<p>Pinky Raina is USSF's Chief Financial Officer.</p> <p>She will testify on USSF's budgeting process, financial records relating to revenue and expenses for the WNT and MNT, and financial record-</p>	<p><i>Live or by Deposition Video</i></p> <p>Plaintiffs: 1 hour</p>

Witness Name/Address	Brief Statement of Testimony	Time Estimate
	keeping.	USSF: 2.0 hours This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's testimony at trial.
Jill Ellis c/o Brian Stolzenbach Seyfarth Shaw LLP 233 S. Wacker Drive Suite 8000 Chicago, IL 60606 Tel.: (312) 460-5551	Jill Ellis the former head coach of the WNT. Ms. Ellis will testify on the duties and responsibilities of WNT and MNT soccer players and the skill required to complete these duties and responsibilities. She will also testify on USSF's decision-making as it relates to travel, hotel accommodations, and field surfaces for WNT and WNT matches. She will also testify on her preference for grass field surfaces over artificial turf surfaces.	<i>Live or by Deposition Video</i> Plaintiffs: 1 hour USSF: 1.50 hours This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's

Witness Name/Address	Brief Statement of Testimony	Time Estimate
<p>Rich Nichols c/o Craig Budner K&L Gates LLP 1717 Main Street Dallas, TX 75201 Tel.: (214) 939-5806</p>	<p>Mr. Nichols is the WNTPA’s former Executive Director. In that capacity, he helped negotiate the WNTPA’s current collective bargaining agreement with USSF.</p> <p>He will testify on the WNTPA’s and USSF’s respective positions during negotiations over the current collective bargaining agreement for the WNT.</p>	<p>testimony at trial.</p> <p><i>By Deposition Video</i></p> <p>Plaintiffs: 0.75 hours</p> <p>USSF: 2.50 hours</p> <p>This witness appears in both Plaintiffs’ list and USSF’s list. The times listed in Plaintiffs’ list cover the total time expected for the witness’s testimony at trial.</p>
<p>John Langel c/o William Slaughter Ballard Spahr LLP 1735 Market Street Philadelphia, PA 19103 Tel.: (215) 864-8114</p>	<p>Mr. Langel was the WNTPA’s Executive Director before Mr. Nichols held that position. In that capacity, he negotiated the WNTPA’s prior collective bargaining agreements with USSF.</p> <p>He will testify on the WNTPA’s and USSF’s respective positions during negotiations over prior collective bargaining agreements for the WNT, including the WNTPA’s requests for</p>	<p><i>By Deposition Video</i></p> <p>Plaintiffs: 1.25 hours</p> <p>USSF: 2.50 hours</p> <p>This witness appears in both Plaintiffs’ list and USSF’s list.</p>

Witness Name/Address	Brief Statement of Testimony	Time Estimate
	<p>equal pay. He will also testify about his correspondence with the United States Olympic Committee concerning USSF’s discriminatory treatment of WNT players.</p>	<p>The times listed in Plaintiffs’ list cover the total time expected for the witness’s testimony at trial.</p>
<p>The Coca-Cola Company through 30(b)(6) Designee John Seiler c/o David Carpenter Alston & Bird 1201 West Peachtree St. Atlanta, GA 30309 Tel.: (404) 881-7881</p>	<p>Mr. Seiler is employed as the Director of Pro Sports Marketing Portfolio at the Coca-Cola Company (“Coca-Cola”).</p> <p>He will testify on Coca-Cola’s sponsorship agreements with USSF and/or Soccer United Marketing, Coca-Cola’s commitment to the WNT, the popularity of the WNT in the eyes of Coca-Cola, and the drive to sponsor the USSF because of the WNT. Mr. Seiler will also testify on Coca-Cola’s efforts to ensure equal pay for the WNT players and its negotiations with USSF on that issue.</p>	<p><i>By Deposition Video</i></p> <p>Plaintiffs: 1 hour</p> <p>USSF: 0.25 hours</p>
<p>Visa U.S.A., Inc. through 30(b)(6) Designee Ashley Fisher c/o Andrew Tulumello Gibson, Dunn & Crutcher LLP 1050 Connecticut Avenue N.W. Washington, DC 20036 Tel.: (202) 955-8657</p>	<p>Ms. Fisher will testify on Visa U.S.A., Inc.’s (“Visa”) sponsorship agreements with USSF and/or Soccer United Marketing. She will also testify on Visa’s desire to have its sponsorship money paid to USSF or Soccer United Marketing specifically allocated towards providing equal pay to members of the WNT. She will also testify on Visa’s efforts to ensure that at least half of Visa’s investments would fund women’s soccer and/or the WNT.</p>	<p><i>By Deposition Video</i></p> <p>Plaintiffs: 0.75 hours</p> <p>USSF: 0.25 hours</p>

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II. U.S. Soccer’s Witness List

This list identifies the witnesses (in alphabetical order) whom U.S. Soccer intends to call, or may call, at trial, exclusive of any witnesses whom may be called for rebuttal or impeachment. U.S. Soccer reserves the right to call any witness on Plaintiffs’ witness list, if those witnesses are not in fact called by Plaintiffs. U.S. Soccer expressly reserves the right to supplement this list at any time before trial for any reason, and the right to object to any supplemental witnesses identified by Plaintiffs. U.S. Soccer further reserves the right to call or refrain from calling any of the witnesses on this list.

Plaintiffs note that there is a pending motion *in limine* (Dkt. No. 211) seeking to exclude four of U.S. Soccer’s witnesses (Ross Moses, Paul Marstaller, Amy Hopfinger, and Lisa Levine) for the reasons stated in Plaintiffs’ motion *in limine* No. 7.

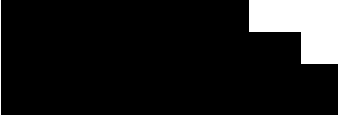


Witness Name/Address ³	Brief Statement of Testimony	Time Estimate
Bradley, Kay* U.S. Soccer 1801 S. Prairie Avenue, Chicago, IL 60616 (312) 808-1300	Ms. Bradley is the Brand Director for USSF. She would testify about USSF’s marketing, advertising, and promotion of the USWNT and USMNT.	<i>Live</i> USSF: 1.50 hours Plaintiffs: 1 hour


³ Pursuant to Local Rule 16-5 the “*” denotes witnesses “whom [U.S. Soccer] may call only if the need arises.”


Witness Name/Address ³	Brief Statement of Testimony	Time Estimate
<p>Ellis, Jill* U.S. Soccer 1801 S. Prairie Avenue, Chicago, IL 60616 (312) 808-1300</p>	<p>Ms. Ellis is the former Head Coach of the USWNT. She would testify about the quality and nature of the coaching, technical, and medical staff, hotel accommodations, field surfaces, and air travel for the USWNT during her tenure, as well as the generally high level of support for the WNT from USSF during her tenure.</p>	<p><i>Live or Video Deposition</i></p> <p>This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's testimony at trial.</p>
<p>Gulati, Sunil</p> 	<p>Mr. Gulati is the former President of USSF, a member of its Board of Directors until March 2020, a member of the FIFA Council, and otherwise a person who has been involved at the highest levels of USSF, FIFA, and Concacaf for many years. He would testify about: the identity, structure, mission, and history of USSF; the international soccer landscape; the history of the USWNT, USMNT, and the various tournaments they play in; the structure, operations, and rules and regulations of FIFA and Concacaf; the parties' conduct during collective bargaining negotiations in 2012-2013 (during which Mr. Gulati led the negotiations on USSF's behalf); the parties' conduct during some collective bargaining sessions in 2016-2017 (when Mr. Gulati was personally present); the basis for USSF's bargaining positions in both sets of negotiations; USSF's support of the NWSL; history of women's professional soccer in the United States; and USSF's financial and other support for the USWNT.</p>	<p><i>Live</i></p> <p>This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's testimony at trial.</p>

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Witness Name/Address ³	Brief Statement of Testimony	Time Estimate
Hopfinger, Amy U.S. Soccer 1801 S. Prairie Avenue, Chicago, IL 60616 (312) 808-1300	Ms. Hopfinger is the Director of Events for USSF. She would testify about the venue selection process for some USWNT and USMNT matches (different matches than those covered by Mr. Marstaller, identified below).	Live USSF: 1.50 hours Plaintiffs: 1 hour
Irwin, Carlyn Cornerstone Research 555 W. 5th street, 38th Floor Los Angeles, CA 90013 (213) 553-2533	Ms. Irwin is a retained expert and a forensic accountant. She would testify to her calculation of MNT and WNT player compensation and USSF game-related revenue during various periods, based on her review of USSF business records (see content of her reports for further details).	Live USSF: 3.0 hours Plaintiffs: 1 hour
King, Tom U.S. Soccer 1801 S. Prairie Avenue, Chicago, IL 60616 (312) 808-1300	Mr. King is the Managing Director of National Teams and has served in a similar role for USSF since the 1990s. He would testify about the parties' conduct during collective bargaining negotiations in 2015-2017 (during which he served as official notetaker for USSF and was present for all but one session); the basis for some of USSF's proposals; the operational distinctness of the USMNT and USWNT; the nature and structure of the tournaments the USWNT and USMNT play in; the U-23 MNT and its compensation (or lack thereof) for playing in the Olympics and Olympic qualifiers; actual compensation paid to the USMNT and USWNT; content and administration of CBAs for both teams; air travel, hotel accommodations, and staff of the two teams; and prize money available from FIFA, Concacaf, and CONMEBOL for different tournaments.	Live This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's testimony at trial.


Witness Name/Address ³	Brief Statement of Testimony	Time Estimate
<p>Klingenberg, Meghan Plaintiff</p> 	<p>Plaintiff Klingenberg was one of three Player Representatives in charge of the WNTPA when it negotiated the current CBA, alleged by Plaintiffs to be discriminatory. Her videotaped testimony includes her own admissions against interest, testimony related to the fact that she was paid more under the 2017 WNT CBA than she would have been paid under the MNT CBA in effect during the same time; testimony about payments made by the WNTPA to players; and testimony about the conduct of negotiations from the perspective of a Player Representative.</p>	<p><i>Video Deposition</i></p> <p>USSF: 0.75 hours</p> <p>Plaintiffs: 0.5 hours</p>
<p>Langel, John</p> 	<p>Mr. Langel is a retired labor lawyer who served as the WNTPA's Executive Director and General Counsel from its formation through 2014. He was the chief spokesperson for the WNTPA during the 2012-2013 negotiations, which culminated in the 2013-2016 CBA. His videotaped testimony authenticates documents related to the 2012-2013 CBA negotiations and includes testimony about those negotiations that supports USSF's legal position, coming from the perspective of Plaintiffs' representative during those negotiations.</p>	<p><i>Video Deposition</i></p> <p>This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's testimony at trial.</p>
<p>Levine, Lisa*</p> 	<p>Ms. Levine is the former General Counsel of USSF. She would testify about the conduct of the parties during collective bargaining negotiations in 2012-2013 (when she served as official notetaker) and the conduct of the parties during collective bargaining negotiations in 2015-2017,</p>	<p><i>Live</i></p> <p>USSF: 1.50 hours</p> <p>Plaintiffs: 1 hour</p>

Witness Name/Address ³	Brief Statement of Testimony	Time Estimate
	including a session at which neither Mr. Gulati nor Mr. King was present.	
Marstaller, Paul U.S. Soccer 1801 S. Prairie Avenue, Chicago, IL 60616 (312) 808-1300	Mr. Marstaller is the Director of Event Revenue for USSF. He would testify about the venue selection process for some USWNT and USMNT matches (different matches than those covered by Ms. Hopfinger, identified above).	<i>Live</i> USSF: 1.50 hours Plaintiffs: 1 hour
McCrary, Justin Columbia University School of Law 521 Jerome Greene Hall New York, NY 10027 (510) 409-6418	Mr. McCrary retained expert and a labor economist. He would testify about his analysis of the USMNT and USWNT CBAs and the compensation of the two teams and certain individual players (see his reports for further detail).	<i>Live</i> USSF: 3.0 hours Plaintiffs: 2 hours
Miscimarra, Philip Partner Morgan, Lewis & Bockius LLP 1111 Pennsylvania Avenue, NW, Washington, DC 20004 (202) 739-5565	Mr. Miscimarra is a retained expert in the field of labor relations. He would explain to the jury how collective bargaining works and whether the WNTPA's and USSF's conduct in negotiations was unusual in light of the rules regulating collective bargaining and the ordinary practice of unions and employers in collective bargaining (see his report(s) for further detail).	<i>Live</i> USSF: 2.0 hours Plaintiffs: 1 hour
Morgan, Alex 	Ms. Morgan is a Plaintiff and Title VII Class Representative. Her testimony includes her own admissions against interest, including but not limited to testimony related to the collective bargaining process from the perspective of a plaintiff, class representative, and member of the WNTPA collective bargaining committee.	<i>Live or Deposition Designation</i> This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's

Witness Name/Address ³	Brief Statement of Testimony	Time Estimate
		testimony at trial.
Moses, Ross U.S. Soccer 1801 S. Prairie Avenue, Chicago, IL 60616 (312) 808-1300	Mr. Moses is Director of Analytics and Research for USSF. He would testify about television ratings and attendance for USMNT and USWNT matches, including specifically the explanation and authentication of business records regarding the same.	<i>Live</i> USSF: 1.25 hours Plaintiffs: 1 hour
Nichols, Rich Former Executive Director of the WNTPA 	Mr. Nichols is a lawyer who served as the WNTPA's Executive Director and General Counsel from late 2014 through late 2016. He was the chief spokesperson for the WNTPA during the 2015-2016 negotiations, which sought to achieve a successor to the 2013-2016 CBA. His videotaped testimony authenticates documents related to the 2015-2016 CBA negotiations and includes testimony about those negotiations that supports USSF's legal position, coming from the perspective of Plaintiffs' representative during those negotiations. His testimony also authenticates documents and provides facts related to side agreements between the WNTPA and USSF concerning player compensation, provides context for the WNTPA's and Plaintiffs' actions in negotiations and this lawsuit, and authenticates documents and provides facts related to payments by USSF to the WNTPA and the distribution of some of those funds to Plaintiffs.	<i>Video Deposition</i> This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's testimony at trial.


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Witness Name/Address ³	Brief Statement of Testimony	Time Estimate
O'Hara, Kelley Plaintiff 	Plaintiff O'Hara is one of three current Player Representatives in charge of the WNTPA, and she participated in the negotiations for the current CBA, alleged by Plaintiffs to be discriminatory. Her testimony includes admissions against interest, testimony related to the fact that she was paid more during certain periods of time under the WNT CBA than she would have been paid under the MNT CBA in effect during the same time; and testimony about the conduct of negotiations from the perspective of a direct participant and member of the WNTPA's collective bargaining committee.	<i>Deposition Designation</i> USSF: 1.25 hours Plaintiffs: 0.5 hours
Press, Christen Plaintiff 	Plaintiff Press was one of three Player Representatives in charge of the WNTPA when it negotiated the current CBA, alleged by Plaintiffs to be discriminatory. Her testimony includes her own admissions against interest and testimony about the conduct of negotiations from the perspective of a Player Representative.	<i>Live or Deposition Designation</i> This witness appears in both Plaintiffs' list and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's testimony at trial.
Raina, Praptika (Pinky) Chief Financial Officer U.S. Soccer 1801 S. Prairie Avenue,	Ms. Raina is USSF's Chief Financial Officer. She would testify about revenue received as a result of the activities of the USWNT and USMNT and monies paid to same and their unions, including (if necessary)	<i>Live</i> This witness appears in both Plaintiffs' list

Witness Name/Address ³	Brief Statement of Testimony	Time Estimate
Chicago, IL 60616 (312) 808-1300	authentication of business records reflecting the same.	and USSF's list. The times listed in Plaintiffs' list cover the total time expected for the witness's testimony at trial.
Roux, Rebecca Executive Director WNTPA 	Ms. Roux has served as the WNTPA's Executive Director since early 2017. She was one of the WNTPA's representatives during the 2017 negotiations that culminated in the current WNT CBA, whose term runs from 2017 through 2021, and she continues to be responsible for administering that CBA. She will testify documents related to the 2017 CBA negotiations and will give testimony about the conduct of those negotiations that supports USSF's legal position, coming from the perspective of Plaintiffs' representative during those negotiations. Her testimony also will include testimony about a calculation Plaintiffs submitted to the Court to demonstrate how they would be paid under the USMNT CBA, which calculation differs materially from the calculation performed by Finnie Cook for the same purpose, the latter of which Plaintiffs now purport to submit to the Court for the same purpose. Her testimony also will authenticate documents and provides facts related to side agreements between the WNTPA and USSF concerning player compensation, payments by USSF to the WNTPA, payments to the WNTPA as a result of a licensing	<i>Live or Video Deposition</i> ⁴ USSF: 1.0 hour Plaintiffs: 1 hour

⁴ USSF has designated Ms. Roux's deposition testimony, but it anticipates subpoenaing her to testify live and anticipates that Ms. Roux will comply with the subpoena. If USSF is required to play videotape of Ms. Roux's deposition testimony, it has designated approximately two hours of testimony.

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Witness Name/Address ³	Brief Statement of Testimony	Time Estimate
	agreement, and distribution of WNTPA funds to Plaintiffs.	
Sauer, Russ* 	Mr. Sauer is a retired lawyer who represented USSF during the 2015-2017 CBA negotiations. He would testify about the conduct of the WNTPA's and USSF's representatives during those negotiations, and this would include testimony regarding one or more conversations with WNTPA representatives during which no other USSF representative was present.	<i>Live</i> USSF: 1.5 hours Plaintiffs: 1 hour

1 Dated: March 31, 2020

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⁵ I, Jeffrey L. Kessler, attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

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