

U. S. Department of Justice

United States Attorney Central District of California

Douglas M. Miller Assistant United States Attorney (213) 894-2216

1300 United States Courthouse 312 North Spring Street Los Angeles, CA 90012

April 5, 2011

TRANSMITTED VIA EMAIL

Janet I. Levine Crowell & Moring LLP 515 South Flower St., 40th Floor Los Angeles, CA 90071

> United States v. Enrique Faustino Aguilar Noriega, et al. Re:

> > CR 10-1031(A)-AHM

Dear Counsel:

The government writes to memorialize your verbal request, made at the end of today's trial proceedings, that the government make available Federal Bureau of Investigation Special Agent Susan Guernsey as a witness in any defense case. Without relinquishing any right to object to her being called in any defense case, the government will make sure that Agent Guernsey is available.

Very truly yours,

ANDRÉ BIROTTE JR. United States Attorney

/s/

DOUGLAS M. MILLER Assistant United States Attorney

NICOLA J. MRAZEK JEFFREY A. GOLDBERG Senior Trial Attorneys Criminal Division, Fraud Section United States Department of Justice 515 South Flower St., 40th Floor, Los Angeles, CA 90071 = p213 622-4750 = f213 622-2690



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SENT VIA E-MAIL ONLY

April 6, 2011

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Douglas M. Miller (douglas.m.miller@usdoj.gov) Assistant United States Attorney 312 North Spring Street Los Angeles, California 90012

Re: United States v. Enrique Faustino Aguilar Noriega, et al.

Case No: 10-1031(A)-AHM

Dear Mr. Miller:

Pursuant to the Court's direction, Lindsey Manufacturing Company (LMC), Dr. Lindsey and Mr. Lee submit the following revised witness list:

- 1) Adam Dawson
- 2) Donald Dodds
- 3) Ronald Durkin
- 4) Susan Guernsey
- 5) Kellie Hua
- 6) Christopher Dean Joaquin
- 7) Lawrence Urgenson
- 8) Rick Zonneville

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The only witness for whom the defense has Jencks material is Ronald Durkin; that material has already been produced. The defense will continue to comply with applicable discovery obligations.

Yours very truly,

Janet Levine

cc (via email only.):

Jan Handzlik (handzlikj@gtlaw.com) Steven Larson (slarson@girardikeese.com) Jeffrey Goldberg (jeffrey.goldberg2@usdoj.gov) Nicola Mrazek (nicola.mrazek@usdoj.gov)