

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

CAREER AGENTS NETWORK,  
INC., a Michigan corporation,

Case No. 2:09-cv-12269

Plaintiff,

Hon. Robert H. Cleland

vs.

careeragentsnetwork.biz,  
careeragentnetwork.biz, Lawrence R.  
White, an individual, and Aeromedia  
Marketing, Inc., a Michigan corporation,

Defendants.

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**DEFENDANTS' WITNESS LIST**

Defendants, careeragentsnetwork.biz, careeragentnetwork.bix, Lawrence R. White and AeroMedia Marketing, Inc., submit the following Witness List pursuant to the Court's Scheduling Order of September 18, 2009.

1. Lawrence R. White, individually, will testify to the factual issues in defense of the allegations set forth in Plaintiff's Complaint that neither he or any companies with which he is associated sought to nor did they profit from the website at issue.
2. Lawrence R. White on behalf of AeroMedia Marketing, Inc., will testify, as the designated agent of Defendant Corporation to the factual issues in defense of the allegations set forth

in Plaintiff's Complaint, including the fact that neither he or any companies with which he is associated sought to nor did they profit from the website at issue.

3. Paul Braun, Accunet. Mr. Braun is expected to testify as the Registrant and Administrative contact for multiple domain names not under his ownership that contain the Plaintiff's name.
4. Brian Marchant-Calysn is expected to testify as to the sale of the assets of Health Care Agents to Charlotte Byndas and Paul Helm, including the date of sale, agreements entered, and consideration received. Mr. Marchant-Calsyn is also expected to testify regarding the relationship between Corporate Finance of America and any agreements entered into with Career Agents Network and Disclosure statements provided to prospective owners of the predecessor company.
5. Charlotte Byndas is expected to testify as to the fact that Career Agents Network ("CAN") has no competitors in the marketplace; that CAN has suffered no monetary losses resulting from the alleged acts of Defendants; that her business is not a recognizable name in the public; that she sent Defendant White harassing text messages and conducted surveillance on his personal residence and neighbors.
6. Joshua Decker will testify as to the facts set forth in his "declaration" in support of Plaintiff's Cross-Motion for Summary Disposition.
7. Paul Helm is expected to testify to the allegations in Plaintiff's Complaint including the same issues as Ms. Byndas.
8. Lynden Kidd, Advisory Board, will testify to receiving copies of e-mails regarding the Defendants forwarded to her by Ms. Byndas and that it was only after the issuance of a court order that anyone had the capability or knowledge of contacting the Defendant regarding the

website.

9. Richard Yadon will testify to receiving copies of e-mails regarding the Defendants forwarded to him by Ms. Byndas and that it was only after the issuance of a court order that anyone had the capability or knowledge of contacting the Defendant regarding the website.
10. Mike Ott will testify to receiving copies of e-mails regarding the Defendants forwarded to him by Ms. Byndas and that it was only after the issuance of a court order that anyone had the capability or knowledge of contacting the Defendant regarding the website.
11. Robert Kurz, Advisory Board, will testify to receiving copies of e-mails regarding the Defendants forwarded to him by Ms. Byndas and that it was only after the issuance of a court order that anyone had the capability or knowledge of contacting the Defendant regarding the website.
12. Glynda Finister. Ms. Finister is an agent-owner who will testify that she was aware of the website at issue but only as a member and that she had no idea who created the website. Additionally, she will testify that there were no links, connections or reference to any individual or entity of the website.
13. Any and all witnesses listed on Plaintiff's Witness List.
14. Any witnesses necessary for rebuttal.
15. Defendants reserve the right to add additional witnesses as they become known throughout the course of discovery as permitted by applicable court rules and as provided in this Court's Scheduling Order.

/s/ Charles E. Clos  
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**Certificate of Service**

I hereby certify that on February \_\_\_\_, 2010, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Michigan using the ECF System which will send notification to the following registered participants of the ECF System as listed on the Court's Notice of Electronic Filing:

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