

U.S. Department of Justice

Enron Task Force

515 Rusk Avenue Room 12140 Houston, Texas 77002

January 6, 2006

Mr. Daniel M. Petrocelli, Esq. Mr. Matthew T. Kline, Esq. O'MELVENY & MYERS LLP 1999 Avenue of the Stars, 7th Floor Los Angeles, California 90067

Mr. Michael Ramsey, Esq. Mr. Chip B. Lewis, Esq. River Oaks/Welch Building 2120 Welch Houston, Texas 77019

Mr. Ronald G. Woods, Esq. 5300 Memorial, Suite 1000 Houston, Texas 77007

> Re: Production of Government's Updated Witness List

Counsel:

Attached hereto is a copy of our revised witness list in compliance with the Court's instructions on December 28, 2005. Please note that we have removed the following names from the list that we produced to you on December 15, 2005:

Carl Bass Dana Lee Cassandra Schultz Eric Boyt Lindsay Long Chris Sherman Chris Calger Sean Long Ryan Synnott Ron Coker Jesus Melendrez Joyce Tang Mike Jones Deborah Perotta Warren White Patti Klien Jennifer Riley

In addition, you will find that the follow witnesses have been added to our list:

Karen Choyce

Ed Kosmicki

David Port

Joanne Cortez

This list represents our view of the case at this time. We may need to supplement the list as the trial approaches and we reserve the right to do so.

Sincerely,

SEAN M. BERKOWITZ

Director, Enron Task Force

Cliff/Stricklin

Assistant United States Attorney

Enron Task Force

cc: The Honorable Sim Lake
United States District Court
Southern District of Texas
Houston, Texas 77002

att.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS **HOUSTON DIVISION**

UNITED STATES of AMERIC	CA	§	
		§	
-VS.~		§	Crim. No. H-04-25 (S-2)
		§	
JEFFREY K. SKILLING and		§	
KENNETH LAY,		§	
		§	
	Defendants	§	

GOVERNMENT'S REVISED WITNESS LIST **JANUARY 6, 2006**

Christopher Abel Sheila McNulty Vincent Anzalone Peter Melley Mike Muckleroy Ron Barone Tom Bauer Eric Mullins John Beard John Nelson Tim Belden Mark A. Palmer Sarah Palmer Don Black Norman Blake **David Port** Pam Butler Dale Rasmussen Karen Choyce Glenn Ray Wesley Colwell Andrea Reed Joanne Cortez Ken Rice Wanda Curry Paula Rieker Katherine Dalton Richard Sanders Charles Davidow John Schreiber David Delainey Jim Schwieger John Diaz Marc Shapiro John Duncan Andrew Fastow Stephanie Anderson Forest John Sides Ben Glisan Ryan Siurek Kevin Hannon Rebecca Smith

Keith Harris Julie Haviland Stan Horton Wincenty Kaminski Carolyn Kee Kelly Kimberly Mark Koenig

Chris Loehr Amanda Martin Stephen Schwarzbach Peter K. Shonerd John Stewart John R. Sult Terrance Thorne Sherron Watkins Terry West Sidonia Wilson

David Woytek

Howard Zall

ENTITIES FROM WHICH THE GOVERNMENT MAY BE CALLING CUSTODIANS:

Arthur Anderson Bank of America

Barclays Bloomberg Charles Schwab

CIBC Citicorp

Credit Suisse First Boston

Deloitte & Touche

Dynegy Enron

Goldman Sachs Harrier I LLC Innovision Janus

J.P. Morgan-Chase Ed Kosmicki Luntz Research Merrill Lynch PaineWebber Southwest Bank

Southwest Bank Thomson Financial

Wessex

Wilmington Trust

SUMMARY WITNESSES:

Special Agent, IRS Special Agent, FBI