**WITNESS AND EXHIBIT LIST**

NOW COMES (“Defendant”), by and through hisr attorneys, The Law Offices of Brian P. Parker, P.C. presents the EXHIBIT and WITNESS List as follows in the case against Citibank, N.A. (Citibank).

1. All the Exhibits in any deposition taken in this case.
2. Any Default and Collection Services Agreement that CITIBANK or UHG or servicers operate from.
3. All information sent by CITIBANK to prosecute the civil action against the Defendant, especially by algorithm and through Original Creditor employees.
4. The Complaint and documents attached to the Complaint and Counter Complaint in this case.
5. Deposition transcripts.
6. All proof of the loan, cardholder agreement and disclosure statement.
7. The Indenture between the Original Creditor and Plaintiff involving the Secured Trust that has the debt or Master Trust.
8. Proof that the right, title and interest of the debt in this case was transferred or assigned to the Trust and then back to Citibank to prosecute this case.
9. Deposit and Sale Agreement between Plaintiff and any owners of the debt.
10. All paperwork from or for Citibank showing an assignment, ownership or transfer of the Defendant debt or financed loan.
11. All Collection paperwork mentioning Citibank and anyone else.
12. All original creditor paperwork.
13. All paperwork showing the transfer, sale, or assignment of the debt from the Original Creditor to anyone else.
14. All the Exhibits mentioned on Plaintiff’s Exhibit List.
15. Proof of ownership of the debt.
16. Original Credit Card Agreement between Citibank and Defendant under the Best Evidence Rule.

## RESERVATION OF RIGHT

Defendant/Counter Plaintiff reserves the right to amend its identification of exhibit lists as additional information becomes known through the course of discovery, up to the time of trial, as may be permitted by Court rule, order of the Court, or otherwise.

/s/Brian P. Parker\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

BRIAN P. PARKER (P48617)

Dated: Defendant/Counter-Plaintiff

**DEFENDANT V CITIBANK WITNESS LIST**

The Defendants by and through their attorneys, The Law Offices of Brian P. Parker, P.C. presents the WITNESS List as follows in the case against CITIBANK:

1. All the Witnesses mentioned in Plaintiff’s Witness List.
2. Plaintiff Custodian of Records.
3. All Witnesses necessary to show ownership or lack of ownership of the subject debts sued upon in State Court.
4. All Witnesses necessary to show ownership of the right, title, and interest of the debt by an Indenture Trustee or anyone else.
5. All Witnesses necessary to show the chain of title and ownership or lack of the chain and ownership of the subject debt.
6. Original Credit Card Agreement between Citibank and Defendant under the Best Evidence Rule.
7. **Defendant Expert Witness** on chain of title expertise
8. Anyone deposed in this case.
9. Any Rebuttal witnesses.
10. Original Creditor or Bank Custodian of Records for the Original Creditor.
11. Any servicer representative familiar with the collection or servicing of the debt.
12. Custodian of Records from Citibank and the Secured Trust Trustee documents showing the transfer of the specific debt of Defendant being transferred.
13. Custodian of Records for each owner/transferee/transferor/Assignee of the debt.
14. Defendant reserves the right to Amend this list as Discovery progresses.

LAW OFFICES OF BRIAN P. PARKER PC

/s/Brian P. Parker\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

BRIAN P. PARKER (P48617)

Dated: Attorney for Defendant

## RESERVATION OF RIGHT

Defendant/Counter Plaintiff reserves the right to amend its identification of witnesses lists as additional information becomes known through the course of discovery, up to the time of trial, as may be permitted by Court rule, order of the Court, or otherwise.

LAW OFFICES OF BRIAN P. PARKER PC

/s/Brian P. Parker\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

BRIAN P. PARKER (P48617)

Dated: Attorney for Defendant/Counter-Plaintiff

**PROOF OF SERVICE**

 On , the Witness List and Exhibit List from the Defendant/Counter Plaintiff were mailed to the Court and Counsel for Plaintiff.

 /s/Brian P. Parker\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 BRIAN P. PARKER (P48617)