

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO, ex rel.,
MARCO WHITE, MARK MITCHELL,
and LESLIE LAKIND,

Plaintiffs,

vs.

Case No. D-101-CV-2022-00473

COUY GRIFFIN,

Defendant.

PLAINTIFFS' PRELIMINARY WITNESS LIST

Plaintiffs Marco White, Mark Mitchell, and Leslie Lakind (collectively, "Plaintiffs"), by their counsel and pursuant to the Court's June 14, 2022 Scheduling Order, hereby identify the following fact and expert witnesses who will or may testify at trial in this action. As discovery in this action remains ongoing, Plaintiffs reserve the right to supplement this list as additional information is provided by Defendant or developed in discovery, or as necessary for rebuttal.

1. Inspector John Erickson
c/o Magdalena A. Boynton
Office of the General Counsel
U.S. Capitol Police
119 D Street, NE
Washington, DC 20510

Inspector Erickson has knowledge about the facts and circumstances of the January 6, 2021 attack on the United States Capitol. Inspector Erickson will testify by transcript of his testimony in *United States v. Griffin*, 21-cr-92-TNM (D.D.C.).

2. Mark Graber
c/o Joseph Goldberg
FREEDMAN BOYD HOLLANDER & GOLDBERG P.A.
20 First Plaza NW, Suite 700
Albuquerque, NM 87102

Dr. Graber will testify with respect to his opinions as separately disclosed.

3. Couy Griffin



Defendant will testify about the facts and circumstances of the January 6, 2021 attack on the United States Capitol.

4. Nate Gowdy

c/o Joseph Goldberg
FREEDMAN BOYD HOLLANDER & GOLDBERG P.A.
20 First Plaza NW, Suite 700
Albuquerque, NM 87102

Mr. Gowdy will testify about the facts and circumstances of the January 6, 2021 attack on the United States Capitol.

5. Inspector Lanelle Hawa

c/o Thomas F. Huse
U.S. Secret Service
U.S. Department of Homeland Security
245 Murray Lane, SW – BLDG T-5
Washington, D.C. 20223

Inspector Hawa will testify about the facts and circumstances of the January 6, 2021 attack on the United States Capitol. Inspector Hawa will testify by transcript of her prior trial testimony in *United States v. Griffin*, 21-cr-92-TNM (D.D.C.).

6. Metropolitan Police Department Officer Daniel Hodges

c/o Joseph Goldberg
FREEDMAN BOYD HOLLANDER & GOLDBERG P.A.
20 First Plaza NW, Suite 700
Albuquerque, NM 87102

Officer Hodges will testify about the facts and circumstances of the January 6, 2021 attack on the United States Capitol.

7. Rachel Kleinfeld

c/o Joseph Goldberg
FREEDMAN BOYD HOLLANDER & GOLDBERG P.A.
20 First Plaza NW, Suite 700
Albuquerque, NM 87102

Dr. Kleinfeld will testify with respect to her opinions as separately disclosed.

8. Matthew Struck
c/o Stanley M. Brand
Brand Woodward Law
2001 K Street, NW
Washington, DC 20006

Mr. Struck will testify about the facts and circumstances of the January 6, 2021 attack on the United States Capitol. Mr. Struck will testify by deposition.

9. Any witness(es) necessary for rebuttal.
10. Any witness(es) necessary to authenticate an exhibit.
11. Any witness(es) identified by any other party to this action.
12. Any witness(es) identified through further discovery in this action.

Date: July 25, 2022

Respectfully Submitted,

FREEDMAN BOYD HOLLANDER
& GOLDBERG, P.A.

/s/ Joseph Goldberg
Joseph Goldberg
20 First Plaza NW, Suite 700
Albuquerque, NM 87102
P: 505.842.9960, F: 505.944.8060
jg@fbdlaw.com

Christopher A. Dodd
Dodd Law Office, LLC
20 First Plaza NW, Suite 700
Albuquerque, NM 87102
P: 505.475.2742
chris@doddnm.com

Amber Fayerberg
Law Office of Amber Fayerberg
2045 Ngunguru Road
Ngunguru, 0173, New Zealand
P: +64 27 505 5005
amber@fayerberglaw.com
Noah Bookbinder*

Donald Sherman*
Nikhel Sus*
Stuart McPhail*
Citizens for Responsibility and Ethics in
Washington
1331 F Street NW, Suite 900
Washington, DC 20004
P: 202.408.5565
nbookbinder@citizensforethics.org
dsherman@citizensforethics.org
nsus@citizensforethics.org
smcphail@citizensforethics.org
**Pro Hac Vice*

Daniel A. Small*
Cohen Milstein Sellers & Toll PLLC
1100 New York Avenue, NW
Fifth Floor
Washington, DC 20005
P: 202.408.4600
dsmall@cohenmilstein.com
**Pro Hac Vice*

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2022, I filed the foregoing Plaintiffs' Preliminary Witness List through the New Mexico Odyssey File & Serve system, which caused all counsel of record to be served by electronic means.

Defendant Griffin was served the foregoing via e-mail and 2 identical packages of the foregoing as indicated below:

1) by U.S. Postal First Class Mail and 2) by Federal Express, two-day delivery available to Tularosa, NM to the following address:

Couy Griffin



/s/ Joseph Goldberg _____
Joseph Goldberg

Counsel for Plaintiffs