

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

STARR INTERNATIONAL COMPANY,  
INC., on its behalf and on behalf of a class of  
others similarly situated,

*Plaintiff,*

v.

THE UNITED STATES,

*Defendant.*

No. 11-00779C (TCW)

**PLAINTIFFS' CORRECTED WITNESS LIST**

Plaintiff Starr International Company, Inc., on behalf of itself and the Credit Agreement and Stock Split Classes, respectfully submits the following list of witnesses to be called for its case-in-chief at trial pursuant to ¶ 3(e) of the Court's August 2, 2013 Pretrial Order and Appendix A, ¶ 15(a) of the Rules of the United States Court of Federal Claims.

Plaintiffs reserve the right to call witnesses not listed below for impeachment or rebuttal, if the need arises. Plaintiffs also reserve the right to call any witness listed on Defendant's witness list and to call additional witnesses if necessary to overcome Defendant's objections to the admission of government documents.<sup>1</sup>

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<sup>1</sup> Almost all of the witnesses Plaintiffs expect to present in their case-in-chief or as a rebuttal witness are witnesses that are under Defendant's control or that are otherwise unavailable to or expected to be hostile towards Plaintiffs. Plaintiff has indicated with an (\*) witnesses with whom it shares counsel.

Plaintiff will call the following witnesses for its case-in-chief at trial:

1. Stephen Albrecht  
Former Counselor to the General Counsel, Department of the Treasury

c/o Rebecca R. Anzidei  
Stein, Mitchell, Muse & Cipollone, LLP  
1100 Connecticut Avenue, NW, Suite 1100  
Washington, DC 20036

Mr. Albrecht is expected to testify on the drafting of the Credit Agreement, the purpose of the equity stake, the purpose of the Trust, the Government's authority to hold the equity stake, and the Government's control of AIG.

The direct examination of Mr. Albrecht is expected to take approximately 1.5 hours.

2. Scott Alvarez  
General Counsel, Federal Reserve

Mr. Alvarez may be contacted through Defendant's counsel. He is expected to testify on the drafting of and communication concerning the Credit Agreement and a Section 13(3) loan to AIG, the Government's authority to hold equity, discussions on the form of equity, the purpose of the Trust, the necessity of a shareholder vote, and discussions and analysis concerning Section 13(3) authority historically, including during the sale of Bear Stearns.

The direct examination of Mr. Alvarez is expected to take approximately 2.5 hours.

3. Thomas Baxter  
General Counsel and Executive Vice President, Federal Reserve Bank of New York ("FRBNY")

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Mr. Baxter is expected to testify on FRBNY's awareness of AIG's liquidity and solvency in 2008, the purpose, structure, and organization of the Trust, FRBNY's initial lending to AIG, drafting of and communication concerning the Credit Agreement and a Section 13(3) loan to AIG, selection and participation of Trustees, and communication between Trustees and the Government.

The direct examination of Mr. Baxter is expected to take approximately 3.5 hours.

4. Ben Bernanke  
Former Chairman, Federal Reserve

Mr. Bernanke may be contacted through Defendant's counsel. He is expected to testify on the purpose and role of Federal Reserve as lender of last resort, the general economic environment in 2007-2009, including the FOMC's and FRBNY's analysis thereof, discussions and approval of a Section 13(3) loan to AIG on September 16, 2008, whether the Federal Reserve investigated AIG prior to establishing the terms of the Credit Agreement, what is meant by "broad-based" program and its connection if any to the economic source of the need for liquidity assistance by a systematically important institution, what terms were approved by the Board of Governors, communications and analysis concerning terms of AIG assistance, approval of Maiden Lane II and III, the state of the economy at the time of the AIG loan, and the systemic risk posed by AIG.

The direct examination of Mr. Bernanke is expected to take approximately 4.5 hours.

5. Stephen Bollenbach  
Former Director, AIG

c/o Paul C. Curnin  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, New York 10017

Mr. Bollenbach is expected to testify on the AIG Board's evaluation of the terms offered by the Government, the Government's involvement in Board decisions, and the Government's control over AIG and its board members.

The direct examination of Mr. Bollenbach is expected to take approximately 0.75 hours.

6. John Brandow  
Partner, Davis, Polk & Wardwell LLP

Davis, Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

Mr. Brandow is expected to testify concerning the June 2009 proxy and discussions related to amending AIG's charter, timing of a proxy, and the Government's oversight of AIG.

The direct examination of Mr. Brandow is expected to take approximately 0.75 hours.

7. Douglas Chamberlain\*  
Stock Split Class Member

111 Robin Hood Lane  
Quispamsis, New Brunswick, Canada E2E1E9

Mr. Chamberlain will testify on the effect the Government's action had on his AIG stock holdings and the holdings of shareholders similarly situated.

The direct examination of Mr. Chamberlain is expected to take approximately 0.75 hours.

8. H. Rodgin Cohen  
Partner, Sullivan & Cromwell LLP, and Counsel to AIG Board

Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004

Mr. Cohen is expected to testify on AIG's efforts to obtain government assistance prior to September 2008, AIG's efforts to obtain private sector financing, the September 2008 AIG Board meetings he participated in, discussions concerning an AIG loan and later the Credit Agreement, and the Government's treatment of similarly situated entities during the financial crisis.

The direct examination of Mr. Cohen is expected to take approximately 2.0 hours.

9. Michael Cragg\*  
Principal, The Brattle Group

44 Brattle Street  
Cambridge, MA 02138

Mr. Cragg will provide expert testimony on the causes of AIG's 2008 liquidity issues, the effects of artificially depressed valuations during financial panics and the implications thereof for the Government's treatment of AIG and other institutions, emergency lending in a financial crisis and the Federal Reserve's historical role as lender of last resort, the punitive nature of the terms of the revolving credit facility, the coercive nature of the Government's actions, and the impact the Government's use of AIG as a governmental instrumentality or vehicle for providing assistance to others had on AIG and its shareholders, and lack of economic bases for disparate treatment of AIG.

The direct examination of Mr. Cragg is expected to take approximately 4.0 hours.

10. Ernst Csiszar\*  
Clinical Professor, University of South Carolina Moore School of Business

1579 Kathwood Drive  
Columbia, SC 29206

Mr. Csiszar will provide expert testimony on the solvency of AIG's insurance subsidiaries during the 2008 financial crisis, the history of state-centered insurance regulation, Defendant's compliance with state insurance law and regulation, and the likely actions state regulators would have permitted AIG's insurance subsidiaries to have taken to assist their parent with its liquidity issues.

The direct examination of Mr. Csiszar is expected to take approximately 2.0 hours.

11. Sarah Dahlgren  
Former Head of the AIG Monitoring Team, FRBNY

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Ms. Dahlgren is expected to testify concerning the role and activities of FRBNY's AIG Monitoring Team, the selection of Mr. Liddy as CEO, communications with AIG senior management and board, AIG's divestiture of assets, Maiden Lane II and III, government advisors and their role, communications with the Trust and Treasury, and the involvement of and approach taken by FRBNY and Treasury in managing AIG's board and management.

The direct examination of Ms. Dahlgren is expected to take approximately 4.0 hours.

12. Eric Dinallo  
Former Superintendent of the New York State Insurance Department

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Mr. Dinallo is expected to testify concerning the assistance the New York State Insurance Department was prepared to offer AIG in September 2008, AIG's solvency, the relative exposure to credit default swaps other companies faced, AIG's negotiations of a private sector solution, efforts to provide AIG access to the discount window, communications between NYSID and FRBNY and other federal entities concerning AIG, and the effects AIG's filing for bankruptcy would have on its insurance subsidiaries.

The direct examination of Mr. Dinallo is expected to take approximately 2.5 hours.

13. Donald Farnan  
Partner, PricewaterhouseCoopers

c/o Antony Ryan  
Cravath, Swaine & Moore LLP  
Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019

Mr. Farnan is expected to testify on PricewaterhouseCoopers' role as AIG's independent auditor, the methodology for and the valuation of the preferred shares, and evaluation of the likelihood of a successful charter amendment vote.

The direct examination of Mr. Farnan is expected to take approximately 1.75 hours.

14. Chester Feldberg  
Former Trustee, FRBNY AIG Trust

c/o Lucy S. McMillan  
Arnold & Porter LLP  
399 Park Avenue  
New York, NY 10022

Mr. Feldberg is expected to testify on his selection as a trustee, his prior relationship and experience with FRBNY, communications with FRBNY personnel, how he received information about AIG as a trustee, his knowledge of issues AIG faced during his tenure as a trustee, and how the trustees made decisions.

The direct examination of Mr. Feldberg is expected to take approximately 1.0 hours.

15. Douglas Foshee  
Former Trustee, FRBNY AIG Trust

c/o Lucy S. McMillan  
Arnold & Porter LLP  
399 Park Avenue  
New York, NY 10022

Mr. Foshee is expected to testify on his selection as a trustee, his prior relationship with FRBNY, how he received information about AIG as a trustee, his knowledge of issues AIG faced during his tenure as a trustee, and how the trustees made decisions.

The direct examination of Mr. Foshee is expected to take approximately 1.0 hours.

16. Timothy Geithner  
Former President, FRBNY, and Former Secretary of the Department of the Treasury

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Mr. Geithner is expected to testify on the drafting and communications concerning the Credit Agreement, the decisions on requiring an equity term and the form of equity, the analysis the FOMC and FRBNY of the artificiality of valuation and its implication for justifications of treatment of AIG, the purpose and effect of the Credit Agreement's terms, discussions and communications concerning a Section 13(3) loan to AIG, the systemic risk posed by AIG, whether FRBNY had engaged in any analysis of the relative risk profile or behaviors of AIG versus other institutions, communications with other federal and state governmental entities concerning AIG, and FRBNY's knowledge of AIG's liquidity problems before and during September 2008.

The direct examination of Mr. Geithner is expected to take approximately 6.0 hours.

17. David Head

Managing Director and Co-head of Global Financial Institutions Group, Citigroup

c/o Richard Rosen  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, NY 10019

Mr. Head is expected to testify concerning the Series E & F fairness opinions, the assumptions used in these opinions, the market demand for the Series C preferred stock, and the scope of government assistance to Citigroup.

The direct examination of Mr. Head is expected to take approximately 1.0 hours.

18. James Head

Managing Director, Morgan Stanley

c/o Andrew Rhys Davies  
Allen & Overy LLP  
1221 Avenue of the Americas  
New York, NY 10020

Mr. Head is expected to testify on the purpose and scope of Morgan Stanley's engagement by the Federal Reserve to assist in its management of AIG, the manner in which Morgan Stanley performed this function, and the valuation of AIG collateral and assets.

The direct examination of Mr. Head is expected to take approximately 1.75 hours.

19. David Herzog

Chief Financial Officer, AIG

c/o Joseph S. Allerhand  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

Mr. Herzog is expected to testify on the relationship between AIG and the Government during the term of the Credit Agreement, AIG's liquidity needs in September 2008, communications between AIG and FRBNY concerning AIG's liquidity needs in mid to late September 2008, sources of AIG liquidity, the events of the September 16, 2008 and the September 16 – 21, 2008 AIG Board meetings, Maiden Lane III, the consequences of filing bankruptcy, valuations of CDS positions and management and oversight of the CDS positions, and valuations of the Series C Preferred Stock.

The direct examination of Mr. Herzog is expected to take approximately 2.0 hours.

20. Marshall Huebner  
Partner, Davis Polk & Wardell LLP

Davis Polk & Wardell LLP  
450 Lexington Avenue  
New York, NY 10017

Mr. Huebner is expected to testify on the drafting and terms of the Credit Agreement, Trust Agreement, Stock Purchase Agreement, Pledge Agreement, and related amendments and agreements, purpose of requiring preferred shares in the Credit Agreement, the Government's oversight of AIG, Davis Polk's role in that oversight and as advisor to Defendant, AIG's restructuring, and participation in public messaging and congressional relations concerning AIG.

The direct examination of Mr. Huebner is expected to take approximately 2.5 hours.

21. Donald Kohn  
Vice Chairman and Governor, Federal Reserve Board of Governors

Mr. Kohn may be contacted through Defendant's counsel. He is expected to testify on the role of the Federal Reserve as lender of last resort, general economic environment in 2007-2009, process of Section 13(3) approval of lending, FOMC and Fed role in price setting and devaluation, AIG's request for assistance in mid-September 2008, the role of the Board of Governors in setting term sheets like the one presented to AIG and the terms the Board approved, discussion of AIG by the Federal Reserve's Federal Open Markets Committee, the security provided for the loan to AIG, communications and analysis concerning terms of AIG assistance, and the terms and approval of the Maiden Lane II and III transactions by the Board.

The direct examination of Mr. Kohn is expected to take approximately 4.0 hours.

22. S.P. Kothari\*  
Deputy Dean and Gordon Y. Billard Professor in Management, MIT Sloan School of Management

30 Memorial Drive, E60-382  
Cambridge, MA 02142

Mr. Kothari will provide expert testimony on damages.

The direct examination of Mr. Kothari is expected to take approximately 6.0 hours.

23. Edward Liddy  
Former Chairman and Chief Executive Officer, AIG

c/o Joseph S. Allerhand  
Weil, Gotshal & Manges LLP



767 Fifth Avenue  
New York, NY 10153

Mr. Liddy is expected to testify on the circumstances of his being hired as CEO of AIG, the role and involvement of the Government in AIG during his tenure, Maiden Lane II and III, the Trust, and the relationship between the Government and AIG during his time as CEO.

The direct examination of Mr. Liddy is expected to take approximately 4.0 hours.

24. Susan McLaughlin  
Senior Vice President, Markets Group, FRBNY

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Ms. McLaughlin is expected to testify concerning the mechanism for posting collateral and collateral posted by AIG pursuant to the Credit Agreement, as well as any procedures and guidelines concerning emergency lending activities as it relates to Section 13(3) and other aspects of the discount window.

The direct examination of Ms. McLaughlin is expected to take approximately 1.5 hours.

25. James Millstein  
Former Chief Restructuring Officer, Department of the Treasury

c/o Frances Bivens  
David Polk & Wardell LLP  
450 Lexington Avenue  
New York, NY 10017

Mr. Millstein may be contacted through Defendant's counsel. He is expected to testify on the terms of the recapitalization agreement, Government oversight and management of AIG, communications between Trustees and the Government concerning AIG, communications between the Government and AIG, Treasury's authority to hold equity, Maiden Lane II and III, and AIG's CDS portfolio generally.

The direct examination of Mr. Millstein would be expected to take approximately 3.0 hours.

26. Henry Paulson  
Former Secretary, Department of the Treasury

c/o Kevin M. Downey  
Williams & Connolly LLP

725 Twelfth Street, NW  
Washington, DC 20005

Mr. Paulson is expected to testify to the decision to lend to AIG, the purpose and effect of the Credit Agreement terms, the potential systemic risk AIG posed to the economy, the authority for the Treasury and/or FRBNY to hold equity, the availability of alternative sources of liquidity, public messaging concerning AIG, communications and analysis concerning terms of AIG assistance, restructuring of assistance in November 2008, and the oversight of and plans for AIG after the Credit Agreement's execution.

The direct examination of Mr. Paulson is expected to take approximately 6.0 hours.

27. Abigail Pratt\*  
Credit Agreement and Stock Split Class Member

10 Water Street  
Housatonic, MA 01236

Ms. Pratt will testify on the effect the Government's action had on her AIG stock holdings and the holdings of shareholders similarly situated.

The direct examination of Ms. Pratt is expected to take approximately 0.5 hours.

28. Andre Salz  
Partner, Deloitte & Touche

c/o Linda M. Beyer  
Deloitte LLP  
30 Rockefeller Plaza  
New York, NY 10112

Mr. Salz is expected to testify on the accounting treatment of the Series C holdings and related issues concerning the Credit Agreement and restructuring of the AIG loan.

The direct examination of Mr. Salz is expected to take approximately 2.5 hours.

29. Kathleen Shannon  
Deputy General Counsel and Corporate Secretary, AIG

c/o Amy Millard  
Clayman & Rosenberg LLP  
305 Madison Avenue  
New York, NY 10017

Ms. Shannon is expected to testify on communications with the Government concerning the Credit Agreement and the Section 13(3) loan to AIG, the Government's oversight and supervision of AIG, the *Walker* litigation, the reverse stock split, and Maiden Lane II and III.

The direct examination of Ms. Shannon is expected to take approximately 2.0 hours.

30. John Studzinski  
Senior Managing Partner, Blackstone Group

c/o Judson Brown  
Kirkland & Ellis LLP  
655 15th Street NW, Suite 1200  
Washington, DC 20005

Mr. Studzinski is expected to testify on AIG's potential sources of liquidity, the Government's frustration of those alternatives, and communications concerning a Section 13(3) loan to AIG.

The direct examination of Mr. Studzinski is expected to take approximately 2.0 hours.

31. Anthony Valoroso  
Chief Accounting Officer, AIG

c/o Joseph S. Allerhand  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

Mr. Valoroso is expected to testify on AIG's accounting treatment of the Credit Agreement and the Preferred Stock, the hiring of KPMG and its valuation work, and interactions and communications with the Government.

The direct examination of Mr. Valoroso is expected to take approximately 1.75 hours.

32. Roland Villacorta  
Managing Director, BlackRock

BlackRock  
55 East 55nd Street  
New York, NY 10055

Mr. Villacorta is expected to testify on BlackRock's engagement by FRBNY, its analysis, evaluation, and recommendations concerning AIG's CDS portfolio, and the creation of Maiden Lane II and III.

The direct examination of Mr. Villacorta is expected to take approximately 2.0 hours.

33. Paul Wazzan\*  
Director, Berkeley Research Group LLC

2049 Century Park East, Suite 2525  
Los Angeles, CA 90067

Mr. Wazzan will provide expert testimony on prejudgment interest.

The direct examination of Mr. Wazzan is expected to take approximately 2.75 hours.

34. Robert Willumstad  
Former Chairman and Chief Executive Officer, AIG

c/o Paul C. Curnin  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, NY 10017

Mr. Willumstad is expected to testify on AIG's attempts prior to September 2008 to obtain Government assistance, communications and discussions concerning terms of AIG assistance, AIG's attempts to obtain a private sector solution and other sources of liquidity, understanding of AIG business operations, communications with various senior government officials concerning AIG in 2008, and communications with senior government officials concerning his job position in particular on September 16, 2008.

The direct examination of Mr. Willumstad is expected to take approximately 3.0 hours.

35. Carolyn Worth  
Principal and Lead Partner on AIG Engagement, KPMG

c/o John Landy  
Williams & Connolly LLP  
725 Twelfth Street, NW  
Washington, DC 20005

Ms. Worth is expected to testify concerning KPMG's engagement by AIG to value the Series C Preferred Shares and the valuation and methodology used.

The direct examination of Ms. Worth is expected to take approximately 2.0 hours.

36. Luigi Zingales\*  
Professor, University of Chicago Booth School of Business

Booth School of Business, The University of Chicago  
5807 Woodlawn Avenue  
Chicago, IL 60637

Mr. Zingales will provide expert testimony on AIG's corporate governance and the Government's control and coercion of AIG.

The direct examination of Mr. Zingales is expected to take approximately 3.5 hours.

Plaintiff may call the following witnesses for its case-in-chief at trial:

37. Joseph Allerhand  
Partner and Counsel to AIG, Weil, Gotshal & Manges LLP

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

Mr. Allerhand may testify on communications between AIG and the Government prior to September 16, 2008, the planning for a proxy vote, and the decision to not amend AIG's charter.

The direct examination of Mr. Allerhand would be expected to take approximately 0.5 hours.

38. David Babbel\*  
Director of Insurance Economics Practice, Charles River Associates

Charles River Associates  
1155 Avenue of the Americas, 18th Floor  
New York, NY 10036

Mr. Babbel may provide expert testimony on AIG's solvency and the outcome of a hypothetical bankruptcy.

The direct examination of Mr. Babbel would be expected to take approximately 2.75 hours.

39. Richard Beattie  
Partner, Simpson Thacher & Bartlett LLP

c/o Paul C. Curnin  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, New York 10017

Mr. Beattie may testify concerning communications amongst and between the Government, AIG, and the AIG Board of Directors concerning the terms of government assistance and available alternatives, the replacement of Mr. Willumstad as CEO and the appointment of Mr. Liddy, the June 2009 proxy statement, and the reverse stock split, the existence and authentication of documents, and a variety of other issues facing the AIG Board of Directors with respect to Government assistance, oversight, and management of AIG.

The direct examination of Mr. Beattie would be expected to take approximately 1.0 hours.

40. Robert Benmosche  
President and CEO, AIG

c/o Joseph Allerhand  
Weil Gotshal & Manges LLP  
767 5th Avenue  
New York, NY 10153

Mr. Benmosche may testify concerning Defendant's control over AIG and contributions that Plaintiffs could have made to AIG's business and asset values.

The direct examination of Mr. Benmosche would be expected to take approximately 1.0 hours.

41. Steven Bensinger  
Former Chief Financial Officer and Vice Chairman of AIG Financial Services, AIG

c/o Joseph de Simone  
Mayer Brown LLP  
1675 Broadway  
New York, NY 10019

Mr. Bensinger may testify on oversight and valuation of AIG's CDS portfolio, the availability of private financing to AIG, and AIG's efforts prior to September 16, 2008 to obtain Government assistance.

The direct examination of Mr. Bensinger would be expected to take approximately 2.0 hours.

42. Bruno Bozzi\*  
Credit Agreement Class Member

Via Pesciatina 34  
Fucecchio (FI), Italy 50054

Mr. Bozzi may testify on the effect the Government's action had on his AIG stock holdings and the holdings of shareholders similarly situated.

The direct examination of Mr. Bozzi would be expected to take approximately 0.5 hours.

43. Zachary Buchwald  
Managing Director, BlackRock

55 East 55nd Street  
New York, NY 10055

Mr. Buchwald may testify on BlackRock's review and evaluation of Maiden Lane II and III and AIG's CDS portfolio more generally.

The direct examination of Mr. Buchwald would be expected to take approximately 1.75 hours.

44. Christopher Calabia

Former Vice President in Financial Sector Analysis Department, FRBNY

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Mr. Calabia may testify concerning early analysis of AIG's financial condition and consideration of assistance and the existence and authentication of documents.

The direct examination of Mr. Calabia would be expected to take approximately 0.25 hours.

45. Terrence Checki

Executive Vice President, FRBNY

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Mr. Checki may testify on FRBNY's monitoring of AIG prior to September 2008, Maiden Lane III, disparate treatment in assistance provided to financial institutions, and the existence and authentication of documents.

The direct examination of Mr. Checki would be expected to take approximately 0.50 hours.

46. Martin Feldstein

Former Director, AIG

c/o Paul C. Curnin  
Simpson, Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, New York 10017

Mr. Feldstein may testify concerning alternatives to government assistance, the AIG Board's evaluation of the terms offered by the Government, the Government's involvement in Board decisions, and the authenticity of certain documents and prior testimony.

The direct examination of Mr. Feldstein would be expected to take approximately 0.25 hours.

47. Joshua Feltman  
Partner, Wachtell, Lipton, Rosen & Katz LLP

Wachtell, Lipton, Rosen & Katz LLP  
51 West 52nd Street  
New York, NY 10019

Mr. Feltman may testify on the basis for the draft September 16, 2008 term sheet.

The direct examination of Mr. Feltman would be expected to take approximately 0.50 hours.

48. Jacob Frenkel  
Former Vice Chairman, AIG

c/o Joseph Allerhand  
Weil Gotshal & Manges LLP  
767 5th Avenue  
New York, NY 10153

Mr. Frenkel may testify concerning alternatives to government assistance and existence and authentication of documents.

The direct examination of Mr. Frenkel would be expected to take approximately 0.25 hours.

49. Jamie Gamble  
Former Partner, Simpson, Thacher & Bartlett LLP

c/o Paul C. Curnin  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, New York 10017

Mr. Gamble may testify concerning communications amongst and between the Government, AIG, and the AIG Board of Directors concerning the terms of government assistance and available alternatives, the replacement of Mr. Willumstad as CEO and the appointment of Mr. Liddy, the existence and authentication of documents, and a variety of other issues facing the AIG Board of Directors with respect to government assistance, oversight, and management of AIG.

The direct examination of the Mr. Gamble would be expected to take approximately 1.0 hours.

50. Goldman Sachs Records Custodian



Goldman, Sachs & Co.  
200 West Street  
New York, NY 10282

Goldman Sachs' records custodian may testify on the existence and authenticity of certain documents produced and possessed by Goldman Sachs & Co.

The direct examination of the Goldman Sachs records custodian would be expected to take approximately 0.50 hours.

51. Elias Habayeb  
Chief Financial Officer, International Lease Finance Corporation

c/o Joseph Allerhand  
Weil Gotshal & Manges LLP  
767 5th Avenue  
New York, NY 10153

Mr. Habayeb may testify concerning AIG's financial condition, CDS agreements, modeling, and actual losses in addition to AIG FP accounting and risk management.

The direct examination of Mr. Habayeb would be expected to take approximately 1.0 hours.

52. Edward Herlihy  
Partner, Wachtell, Lipton, Rosen & Katz LLP

Wachtell, Lipton, Rosen & Katz LLP  
51 West 52nd Street  
New York, NY 10019

Mr. Herlihy may testify on engagement by the Treasury Department to assist with issues related to AIG and Government-Sponsored Enterprises (GSE), drafting of, analysis and communication concerning issues related to the terms of the Credit Agreement and a Section 13(3) loan to AIG, and the form of equity.

The direct examination of Mr. Herlihy would be expected to take approximately 1.0 hours.

53. Ethan T. James  
Partner, Davis, Polk & Wardwell LLP

c/o Frances Bivens  
Davis, Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

Mr. James may testify concerning his law firm's engagement by Treasury and FRBNY to provide advice concerning a loan to AIG, the drafting and communications concerning the Credit Agreement, the decisions on requiring an equity term and the form of equity, the purpose and effect of the Credit Agreement's terms, discussions and communications concerning a Section 13(3) loan to AIG, communications and decisionmaking concerning AIG's proxy statements and timing, the *Walker* lawsuit, reverse stock split, and AIG's restructuring.

The direct examination of Mr. James would be expected to take approximately 2.5 hours.

54. Dan Jester

Former Advisor to the Secretary, Department of the Treasury

c/o Reginald Brown  
Wilmer Cutler Pickering Hale and Dorr LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006

Mr. Jester may testify concerning the drafting of, analysis and communication concerning issues related to the terms of the Credit Agreement and a Section 13(3) loan to AIG and authentication of certain documents.

The direct examination of Mr. Jester would be expected to take approximately 2.0 hours.

55. Peter Juhas

Former Managing Director in the Investment Banking Division, Morgan Stanley

c/o Joseph S. Allerhand  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

Mr. Juhas may testify concerning Defendant's oversight and management of AIG, analysis and valuation of AIG, and the existence and authentication of documents.

The direct examination of Mr. Juhas would be expected to take approximately 1.0 hours.

56. Anastasia Kelly

Former General Counsel, AIG

c/o Joseph S. Allerhand  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

Ms. Kelly may testify communication concerning the Credit Agreement and a Section 13(3) loan to AIG, alternatives to the Agreement available to AIG, the collateral posted

for the Agreement, the Government's oversight and supervision of AIG, the *Walker* litigation and the reverse stock split, and Maiden Lane II and III.

The direct examination of Ms. Kelly would be expected to take approximately 3.0 hours.

57. Richard Kim

Partner, Wachtell, Lipton, Rosen & Katz LLP

Wachtell, Lipton, Rosen & Katz LLP  
51 West 52nd Street  
New York, NY 10019

Mr. Kim may testify on the drafting of and communication concerning the Credit Agreement and a Section 13(3) loan to AIG and on the Treasury Department's and FRBNY's authority to hold equity.

The direct examination of Mr. Kim would be expected to take approximately 1.0 hours.

58. James Lambright

Former Chief Investment Officer of TARP

c/o Reginald Brown  
Wilmer Cutler Pickering Hale and Dorr LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006

Mr. Lambright may testify on authentication of certain Treasury documents, Treasury's role in the loan to AIG, involvement in the Trust, the scope of the Treasury's authority under Emergency Economic Stabilization Act of 2008, and AIG's restructuring.

The direct examination of Mr. Lambright would be expected to take approximately 1.0 hours.

59. Alejandro Latorre

Vice President, FRBNY

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Mr. Latorre may testify on the authenticity of certain documents, FRBNY's deliberative process for deciding whether to offer assistance to AIG, and the Maiden Lane II and III transactions.

The direct examination of Mr. Latorre would be expected to take approximately 0.75 hours.

60. James Lee  
Vice Chairman, JP Morgan Investment Bank

c/o Richard A. Rosen  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, NY 10019

Mr. Lee may testify on private-sector alternatives to government assistance for AIG and the Government's sale of its stake in AIG.

The direct examination of Mr. Lee would be expected to take approximately 1.0 hours.

61. Robert MacLavery\*  
Director, Berkeley Research Group LLC

Berkeley Research Group LLC  
181 West Madison, Suite 2950  
Chicago, IL 60602

Mr. MacLavery may provide expert testimony on AIG's CDS portfolio and the commercial reasonableness of the ML III terms.

The direct examination of Mr. MacLavery would be expected to take approximately 2.75 hours.

62. Lawrence Makow  
Partner, Wachtell, Lipton, Rosen & Katz LLP

Wachtell, Lipton, Rosen & Katz LLP  
51 West 52nd Street  
New York, NY 10019

Mr. Makow may testify on advice and communications concerning terms of the Government loan to AIG and the purpose and effect of change in the form of equity.

The direct examination of Mr. Makow would be expected to take approximately 0.75 hours.

63. Deryck Maughan  
Partner, KKR & Co. L.P.

c/o Andrew Gordon  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, NY 10019

Mr. Maughan may testify on AIG access to private sector funding and events in September 2008.

The direct examination of Mr. Maughan would be expected to take approximately 0.50 hours.

64. Margaret McConnell  
Former Deputy Chief of Staff for Policy and Vice President, FRBNY

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Ms. McConnell may testify concerning the decision to lend to AIG, the Government's response to the financial crisis, and authentication of certain documents.

The direct examination of Ms. McConnell would be expected to take approximately 0.50 hours.

65. George Miles  
Director, AIG

Nicholas Baker  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, NY 10017

Mr. Miles may testify on the AIG Board's evaluation of the terms offered by the Government, the Government's involvement in Board decisions, and the Government's control over AIG and its board members.

The direct examination of Mr. Miles would be expected to take approximately 0.50 hours.

66. Morgan Stanley Records Custodian

1585 Broadway  
New York, NY 10036

Morgan Stanley's records custodian may testify on the existence and authenticity of certain documents possessed and produced by Morgan Stanley.

The direct examination of the Morgan Stanley record custodian would be expected to take approximately 1.0 hours.

67. Patricia Mosser  
Former Senior Vice President, FRBNY

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Ms. Mosser may testify on the role of the Federal Reserve as lender of last resort, and the Government's consideration of providing AIG assistance prior to September 2008.

The direct examination of Ms. Mosser would be expected to take approximately 1.0 hours.

68. William Murphy\*  
Senior Financial, Operations & Administration Executive, Byron Advisors LLC

1623 Third Avenue, Apt. 20A  
New York, NY 10128

Mr. Murphy may provide expert testimony on the likely outcome of a hypothetical AIG bankruptcy.

The direct examination of Mr. Murphy would be expected to take approximately 1.75 hours.

69. Michael Nathan  
Partner, Simpson Thacher & Bartlett LLP

c/o Paul C. Curnin  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, New York 10017

Mr. Nathan may testify concerning liquidity options available to AIG in 2008, the terms of the government loan, the appointment of Mr. Liddy as CEO, the June 2009 proxy statement, and the reverse stock split.

The direct examination of Mr. Nathan would be expected to take approximately 0.75 hours.

70. Susan Nora Johnson  
Director, AIG

c/o Paul Curnin  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, NY 10017

Ms. Nora Johnson may testify on the AIG Board's evaluation of the terms offered by the Government, the Government's involvement in Board decisions, and the Government's control over AIG and its board members.

The direct examination of Ms. Nora Johnson would be expected to take approximately 0.50 hours.

71. Edward O'Brien\*

Director, Berkeley Research Group, LLC

Berkeley Research Group, LLC  
555 Fifth Avenue, Suite 302  
New York, NY 10017

Mr. O'Brien may provide expert testimony on practices in securities lending, including specifically those of AIG.

The direct examination of Mr. O'Brien would be expected to take approximately 2.5 hours.

72. Morris Offit

Former Director, AIG

c/o Paul C. Curnin  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, New York 10017

Mr. Offit may testify concerning alternatives to Government assistance, the AIG Board's evaluation of the terms offered by the Government, the Government's involvement in Board decisions, and the Government's control over AIG and its board members.

The direct examination of Mr. Offit would be expected to take approximately 0.50 hours.

73. George Oldfield\*

Principal, The Brattle Group

The Brattle Group  
1850 M Street, NW, Suite 1200  
Washington, DC 20036

Mr. Oldfield may provide expert testimony on AIG's risk management practices.

The direct examination of Mr. Oldfield would be expected to take approximately 2.0 hours.

74. Virginia Rometty

Former Director, AIG

c/o Paul C. Curnin  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, New York 10017

Ms. Rometty may testify concerning alternatives to government assistance, the AIG Board's evaluation of the terms offered by the Government, the Government's involvement in Board decisions, and the Government's control over AIG and its board members.

The direct examination of Ms. Rometty would be expected to take approximately 0.50 hours.

75. Thomas Russo  
Executive Vice President and General Counsel, AIG

c/o Joseph S. Allerhand  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

Mr. Russo may testify concerning Defendant's control over AIG and contributions that Plaintiffs could have made to AIG's business and asset values.

The direct examination of Mr. Russo would be expected to take approximately 1.0 hours.

76. Kevin Ryan  
Managing Director, Morgan Stanley

c/o Andrew Rhys Davies  
Allen & Overy LLP  
1221 Avenue of the Americas  
New York, NY 10020

Mr. Ryan may testify on the availability of private-sector alternatives and communication concerning a Section 13(3) loan to AIG.

The direct examination of Mr. Ryan would be expected to take approximately 1.0 hours.

77. Tim Ryan  
Vice Chairman and Markets, Strategy and Stakeholders Leader, PricewaterhouseCoopers  
LLP

c/o Antony Ryan  
Cravath, Swaine & Moore LLP  
Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019



Mr. Ryan may testify on PricewaterhouseCoopers' role as AIG's independent auditor, on the methodology for and the valuation of the preferred shares, and evaluation of the likelihood of a successful charter amendment vote.

The direct examination of Mr. Ryan would be expected to take approximately 1.5 hours.

78. Brian Schreiber  
Executive Vice President, AIG

c/o Joseph S. Allerhand  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

Mr. Schreiber may testify on AIG's capital and liquidity raising efforts, the terms of the revolving credit facility, and the authenticity of documents.

The direct examination of Mr. Schreiber would be expected to take approximately 0.25 hours.

79. Michael Silva  
Former Chief of Staff and Senior Vice President, FRBNY

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Mr. Silva may testify concerning discouragement of assistance to AIG, the decision to lend to AIG, and authentication of documents.

The direct examination of Mr. Silva would be expected to take approximately 0.25 hours.

80. Joseph Sommer  
Counsel and Assistance Vice President, Legal Group, FRBNY

c/o John S. Kiernan  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Mr. Sommer may testify on the availability of the discount window to financial institutions during the financial crises, the purpose and historical precedent for requiring equity as part of a government loan, analysis of Section 13(3), communications and discussions concerning AIG, and alternatives to the Credit Agreement for AIG.

The direct examination of Mr. Sommer would be expected to take approximately 1.0 hours.

81. Howard Smith\*

Vice President – Investments, Starr International Company, Inc.

c/o David Boies  
Boies, Schiller & Flexner LLP  
333 Main Street  
Armonk, NY 10504

Mr. Smith may testify concerning Starr's membership in the Credit Agreement and Stock Split Classes and the effect the Government's action had on Starr's AIG stock holdings and the holdings of shareholders similarly situated.

The direct examination of Mr. Smith would be expected to take approximately 0.25 hours.

82. Taiya Smith

Former Deputy Chief of Staff and Executive Assistance to the Secretary,  
Department of the Treasury

The Paulson Institute  
5711 South Woodlawn Avenue  
Chicago, IL 60637

Ms. Smith may testify on the availability of alternative sources of liquidity for AIG and communications and discussions between Treasury personnel and sovereign wealth funds, hedge funds, consortiums and others interested in AIG.

The direct examination of Ms. Smith would be expected to take approximately 1.0 hours.

83. Marc Symons

Partner, Ernst & Young

c/o William P. Hammer, Jr.  
5 Times Square  
New York, NY 10036

Mr. Symons may testify on the Government's engagement of Ernst & Young ("E&Y") to assist the Government oversee AIG, E&Y's valuation of the collateral posted by AIG for the Credit Agreement, and creation and structuring of the Maiden Lane II and III transactions.

The direct examination of Mr. Symons would be expected to take approximately 2.5 hours.

\*\*Should Mr. Symons be called to testify, he will need to testify either via agreed upon deposition excerpts or video conference because he is a non-U.S. citizen living outside of the United States, in Hong Kong, China.

84. Kevin Warsh  
Former Governor, Federal Reserve Board

c/o David Murphy  
Wachtell Lipton Rosen & Katz LLP  
51 West 52nd Street  
New York, NY 10019

Mr. Warsh may testify concerning the Federal Reserve's authority under Section 13(3), the financial crisis and the Government's response thereto, the decision to lend to AIG, and the authentication of certain documents.

The direct examination of Mr. Warsh would be expected to take approximately 0.50 hours.

85. Michael Wiseman  
Partner, Sullivan & Cromwell LLP

Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004

Mr. Wiseman may testify on AIG's efforts to obtain government assistance prior to September 2008, AIG's efforts to obtain private sector financing, the September 2008 AIG Board meetings he participated in, discussions concerning an AIG loan and later the Credit Agreement, and the Government's treatment of similarly situated entities during the financial crisis.

The direct examination of Mr. Wiseman is expected to take approximately 1.0 hours.

Dated: August 11, 2014  
Armonk, New York

Respectfully submitted,  
BOIES, SCHILLER & FLEXNER LLP

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