

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CALEB BARNETT, <i>et al.</i> , Plaintiffs, vs. KWAME RAOUL, <i>et al.</i> , Defendants.	Case No. 3:23-cv-209-SPM ** designated Lead Case
DANE HARREL, <i>et al.</i> , Plaintiffs, vs. KWAME RAOUL, <i>et al.</i> , Defendants.	Case No. 3:23-cv-141-SPM
JEREMY W. LANGLEY, <i>et al.</i> , Plaintiffs, vs. BRENDAN KELLY, <i>et al.</i> , Defendants.	Case No. 3:23-cv-192-SPM
FEDERAL FIREARMS LICENSEES OF ILLINOIS, <i>et al.</i> , Plaintiffs, vs. JAY ROBERT “JB” PRITZKER, <i>et al.</i> , Defendants.	Case No. 3:23-cv-215-SPM

STATE DEFENDANTS’ WITNESS LIST

In accordance with the Court’s June 4, 2024 Scheduling Order (ECF 195) and the Case Management Procedures of Judge Stephen P. McGlynn (at 7-8), and as previously disclosed to all Parties on August 16, 2024 in State Defendants’ Pretrial Disclosures Under Rule 26(a)(3) (attached hereto as Exhibit A), Defendants Governor J.B. Pritzker, Attorney General of Illinois Kwame

Raoul, and Director of the Illinois State Police Brendan Kelly (together, “State Defendants”), by and through their attorney, Kwame Raoul, disclose the following trial witnesses:¹

A. **Live Witnesses.** In compliance with Paragraph 5 of the Joint Stipulation Regarding Expert Witnesses and Trial Procedure, entered by the Court on July 25, 2024 (ECF 218, the “Joint Stipulation”), the State Defendants intend to call the following witnesses to testify at the bench hearing set by the Court to begin on September 16, 2024:

1. Col. Craig Tucker, Retired. *See* Declaration of Craig Tucker (Exhibit B hereto).
2. Lt. Col. Jason Dempsey, Retired. *See* Declaration of Jason Dempsey (Exhibit C hereto).

B. **Declarations.** In compliance with the Court’s June 4, 2024 Scheduling Order (ECF 195) and Paragraphs 8-10 of the Joint Stipulation entered by the Court on July 25, 2024 (ECF 218), in written submissions to the Court the State Defendants expect to cite or rely on the contents of the attached and following witnesses’ declarations, all of which have been filed on the docket:

1. Robert Morgan (ECF 37-2).
2. James Yurgealitis (ECF 185-1)
3. Philip Andrew (ECF 185-2)
4. Dr. Stephen Hargarten (ECF 185-3)
5. Prof. Robert Spitzer (ECF 185-5)
6. Prof. Randolph Roth (ECF (185-6)
7. Lucy Allen (ECF 185-8)
8. Prof. Jens Ludwig (ECF 185-9)
9. Prof. Dennis Baron (ECF 185-10)
10. Dr. Martin Schreiber (ECF 194-1)
11. Prof. Louis Klarevas (ECF 190-1)

¹ This is the witness list of Defendants Raoul and Kelly in *Barnett, et al., v. Raoul, et al.*, No. 23-cv-209-SPM (S.D. Ill.) and *Harrel, et al., v. Raoul, et al.*, No. 23-cv-141-SPM (S.D. Ill.); Defendant Kelly in *Langley, et al., v. Kelly, et al.*, No. 23-cv-192-SPM (S.D. Ill.); and Defendants Pritzker, Raoul, and Kelly in *Federal Firearms Licensees of Illinois, et al., v. Pritzker, et al.*, No. 23-cv-215-SPM (S.D. Ill.).

12. Prof. Brian DeLay (ECF 190-2)

C. **Depositions.** In written submissions to the Court the State Defendants expect to cite or rely on the contents of the deposition transcripts of the following witnesses:

1. James Curcuruto, a former employee of a *Barnett* plaintiff.
2. Salam Fatohi as Rule 30(b)(6) designee of one of the *Barnett* plaintiffs.
3. Jeffrey Eby, as expert witness for the *Barnett*, *Harrel*, and *FFL* plaintiffs.
4. James Ronkainen, as expert witness for the *Barnett*, *Harrel*, and *FFL* plaintiffs.

If plaintiffs indicate that they will offer written or oral testimony from any witness who has been deposed, then the State Defendants reserve the right to cite and rely on additional deposition transcripts from such witness.

Dated: September 6, 2024

Respectfully submitted,

KWAME RAOUL
Attorney General of Illinois

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Governor Pritzker, and ISP Director Kelly*

CERTIFICATE OF SERVICE

I certify that on September 6, 2024, I caused a copy of the State Defendants' Witness List to be served on counsel for all parties using the CM/ECF system.

/s/ Michael M. Tresnowski

Michael M. Tresnowski