

EXHIBIT B
SCHEDULE OF WITNESSES
FOR DEFENDANTS

Exhibit B – Schedule of Witnesses for Defendants

Without the benefit of having received DOJ’s witness list prior to the submission of the Pretrial Statement, below reflects Defendants’ anticipated order of witness. Defendants reserve the right to alter the order, number, and designation of witnesses. Defendants further reserve the right to call witnesses on the DOJ’s witness list.

	Witness	Contact Information	Description of Anticipated Testimony	Will / May Testify
1.	Jennifer Rudolph Walsh*	Daniel M. Petrocelli, Esq. O’Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Ms. Walsh served as a literary agent for more than three decades, overseeing dozens of literary agents over the course of her career. As an industry expert Ms. Walsh will testify that the government’s expert opinions about the merger’s alleged anti-competitive effects are not consistent with the way publishers compete to acquire the rights to books. She will testify about how agents sell books, how rarely books are sold in an auction where PRH and S&S are first and second, and how authors care about and negotiate for more than the initial committed advance.	Will
2.	Madeline McIntosh	Daniel M. Petrocelli, Esq. O’Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Ms. McIntosh, CEO of Penguin Random House U.S., will testify about the publishing industry and the acquisition of book rights.	Will
3.	Sally Kim	Daniel M. Petrocelli, Esq. O’Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Ms. Kim is the publisher of G.P. Putnam’s Sons, an imprint of Penguin Random House. She will testify about the acquisition of book rights, including the competition for book rights, the different ways in which book rights are acquired, and the respective roles of authors, agents, and editors in the acquisition process.	Will

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4.	Jennifer Bergstrom	Stephen Fishbein, Esq. Shearman & Sterling LLP 599 Lexington Avenue New York, NY 10022 Telephone: (212) 848-4000	Ms. Bergstrom is the publisher of Gallery Books Group, a division of Simon & Schuster. She will testify about the acquisition of book rights, including the competition for book rights, the different ways in which book rights are acquired, and the respective roles of authors, agents, and editors in the acquisition process. She will also testify about the benefits to Simon & Schuster authors and imprints from joining Penguin Random House.	Will
5.	Andrew Wylie	Elizabeth McNamara, Esq. Davis Wright Tremaine LLP 1251 Ave. of the Americas, 21st Fl., New York, NY 10020 Telephone: (212) 603-6437	Mr. Wylie, a literary agent at The Wylie Agency, will testify about his role as an agent in selling book rights, the different ways in which he sells those rights, and the competition for those rights.	Will
6.	Gail Ross	Elizabeth McNamara, Esq. Davis Wright Tremaine LLP 1251 Ave. of the Americas, 21st Fl., New York, NY 10020 Telephone: (212) 603-6437	Ms. Ross, a literary agent at Ross Yoon Literary Agency, will testify about her role as an agent in selling book rights, the different ways in which she sells those rights, and the competition for those rights.	Will
7.	Joy Harris	Noah Pinegar, Esq. Paul Hastings, LLP 2050 M Street NW, Washington DC, 20036 Telephone: (202) 551 1960	Ms. Harris, a literary agent at The Joy Harris Literary Agency will testify about her role as an agent in selling book rights, the different ways in which she sells those rights, and the competition for those rights.	Will
8.	Elyse Cheney	Noah Pinegar, Esq. Paul Hastings, LLP 2050 M Street NW, Washington DC, 20036 Telephone: (202) 551 1960	Ms. Cheney, a literary agent at The Cheney Agency, will testify about her role as an agent in selling book rights, the different ways in which she sells those rights, and the competition for those rights.	Will
9.	Chris Parris-Lamb (By Deposition)	Matthew Leish, Esq. Miller Korzenik Sommers Rayman LLP 1501 Broadway, Suite 2015 New York, NY 10036 Telephone: (212) 752-9200	Mr. Parris-Lamb, a literary agent at The Gernet Company, will testify about his practices in selling book rights.	Will

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10.	Alex Berkett	Stephen Fishbein, Esq. Shearman & Sterling LLP 599 Lexington Avenue New York, NY 10022 Telephone: (212) 848-4000	Mr. Berkett, Executive Vice President, Corporate Development and Strategy, ViacomCBS, will testify about the merger transaction.	Will
11.	Brian Murray	Steven G. Mintz, Esq. Mintz & Gold LLP 600 Third Ave, 25th Fl. New York, NY 10016 Telephone: (212) 696-4848	Mr. Murray, President and CEO of HarperCollins Publishers, will testify about the background and business of HarperCollins and competition in the publishing industry.	Will
12.	John Glusman	Lance Koonce, Esq. Klaris Law PLLC 29 Little West 12th St. New York, NY 10014 Telephone: (917) 822-7468	Mr. Glusman, Vice President and Editor-in-Chief at W. W. Norton & Company will testify about the background and business of Norton and competition in the publishing industry.	Will
13.	Brian Tart	Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Mr. Tart is the publisher of Viking, an imprint of Penguin Random House. He will testify about the acquisition of book rights, including the competition for book rights, the different ways in which book rights are acquired, and the respective roles of authors, agents, and editors in the acquisition process.	May
14.	Jon Anderson	Stephen Fishbein, Esq. Shearman & Sterling LLP 599 Lexington Avenue New York, NY 10022 Telephone: (212) 848-4000	Mr. Anderson, the publisher of Simon & Schuster Children's Publishing Division, will testify about the acquisition of book rights, including the different competitive landscape for children's book rights, the different ways in which children's book rights are acquired, and the respective roles of authors, agents, and editors in the acquisition process. He will also testify about the benefits to Simon & Schuster authors and imprints from joining Penguin Random House.	May

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15.	William Thomas	Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Mr. Thomas is the publisher and editor-in-chief of Doubleday, an imprint of Penguin Random House. He will testify about the acquisition of book rights, including the competition for book rights, the different ways in which book rights are acquired, and the respective roles of authors, agents, and editors in the acquisition process.	May
16.	Jonathan Karp	Stephen Fishbein, Esq. Shearman & Sterling LLP 599 Lexington Avenue New York, NY 10022 Telephone: (212) 848-4000	Mr. Karp, President and CEO of Simon & Schuster, will testify about the background and business of Simon & Schuster, the merger transaction, and competition in the publishing industry.	Will
17.	Barbara Marcus	Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Ms. Marcus, the publisher of Random House Children's Division will testify about the acquisition of book rights, including the different competitive landscape for children's book rights, the different ways in which children's book rights are acquired, and the respective roles of authors, agents, and editors in the acquisition process.	May
18.	Tina Constable	Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Ms. Constable, the head of the Christian Publishing program at Penguin Random House, will testify about the acquisition of book rights, including the different competitive landscape for religious book rights, the different ways in which religious book rights are acquired, and the respective roles of authors, agents, and editors in the acquisition process.	May
19.	Charles Duhigg	Elizabeth McNamara, Esq. Davis Wright Tremaine LLP 1251 Ave. of the Americas, 21st Fl., New York, NY 10020 Telephone: (212) 603-6437	Mr. Duhigg, a <i>New York Times</i> best-selling author, will testify about the sale of book rights.	May

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20.	Andrew Solomon (By Deposition or Live)	Darren Johnson, Esq. Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Ave. of the Americas New York, NY 10019	Mr. Solomon, an author who has won a National Book Critics Circle award, will testify about the sale of book rights.	May
21.	Michael Jacobs (By Deposition)	David Korzenik, Esq. Miller Korzenik Sommers Rayman, LLP 1501 Broadway, Suite 2015 New York, NY 10036 Telephone: (212) 752-9200	Mr. Jacobs, President and CEO at Abrams Books, will testify about the background and business of Abrams and competition in the publishing industry.	May
22.	Ellie Berger	Mark H. Hamer, Esq. Baker & McKenzie LLP 815 Connecticut Avenue, NW Washington, DC 20006 Telephone: (202) 452-7000	Ms. Berger, Executive Vice President and President, Trade Publishing at Scholastic Corporation, will testify about the background and business of Scholastic and competition for children's book rights in the publishing industry.	May
23.	Michael Pietsch	Richard Snyder, Esq. Freshfields Bruckhaus Deringer US LLP 700 13th St., NW, 10th Floor Washington, DC 20005 Telephone: (202) 777-4565	Mr. Pietsch, CEO of Hachette Book Group, will testify about the background and business of Hachette and competition in the publishing industry.	May
24.	Don Weisberg	Joel Mitnick, Esq. Cadwalader, Wickersham & Taft LLP 200 Liberty St. New York, NY 10281 Telephone: (212) 504-6555	Mr. Weisberg, CEO of Macmillan Publishers, will testify about the background and business of Macmillan and competition in the publishing industry.	May
25.	Markus Dohle	Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Mr. Dohle, CEO of Penguin Random House, will testify about the merger and the publishing industry.	Will

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26.	Nihar Malaviya	Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Mr. Malaviya is the President and Chief Operating Officer of Penguin Random House U.S. He will testify about the merger and the publishing industry.	Will
27.	Manuel Sansigre	Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Mr. Sansigre, the Head of Global Mergers & Acquisitions at Penguin Random House, will testify about the merger transactions and its benefits.	Will
28.	Edward Snyder*	Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Mr. Snyder will testify about his quantitative analysis of competition in the publishing industry, rebutting the government's expert's opinions about the merger's alleged anticompetitive effects. Mr. Snyder will also testify about the benefits to authors that will result from the efficiencies the combined entity is projected to gain from the merger.	Will
29.	Thomas Rabe (By Deposition or Remote Video Conference)	Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: (310) 553-6700	Mr. Rabe, Chairman and Chief Executive Officer of Bertelsmann, will testify about the merger and the publishing industry.	Will