

**EXHIBIT A**  
**SCHEDULE OF WITNESSES**  
**FOR THE UNITED STATES**

**EXHIBIT A****UNITED STATES' SCHEDULE OF WITNESSES**

The United States anticipates calling the following witnesses live and in-person at trial in the indicated order.

Expert Witnesses are denoted by an asterisk (\*).

Witnesses who may testify in the United States' rebuttal case are denoted by a dagger (†).

#	Name and Address of Witness Testifying Live	Will Call/ May Call	Description of Expected Testimony
1.	<b>Michael Pietsch</b> c/o Richard Snyder, Esq. Freshfields Bruckhaus Deringer US LLP 700 13th Street, NW, 10th Floor Washington, DC 20005	Will Call	Mr. Pietsch, the Chief Executive Officer of Hachette Book Group, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
2.	<b>Ayesha Pande</b> Ayesha Pande Literary Agency 128 West 132nd Street New York, NY 10027	Will Call	Ms. Pande, an agent, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are sold to publishers, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
3.	<b>Stephen King</b> c/o Peter Mucchetti, Esq. Clifford Chance US LLP 2001 K Street, NW Washington, DC 20006	Will Call	Mr. King, an author, is expected to testify about his experiences in selling anticipated top-selling books and his perceptions of the manner in which the market for book rights operates, including at least: the expectations and needs of anticipated top-selling authors; the characteristics of firms that successfully purchase anticipated top-selling books; and the likely effects of the proposed transaction on the market for anticipated top-selling books.

#	Name and Address of Witness Testifying Live	Will Call/ May Call	Description of Expected Testimony
4.	<b>Dennis Eulau</b> c/o Stephen Fishbein, Esq. Shearman & Sterling LLP 599 Lexington Avenue New York, NY 10022	Will Call	Mr. Eulau, the Executive Vice President, Chief Financial Officer, and Chief Operating Officer of Simon & Schuster (“S&S”), is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, the characteristics of firms that purchase anticipated top-selling books, claimed efficiencies from the proposed transaction, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
5.	<b>Jonathan Karp</b> c/o Stephen Fishbein, Esq. Shearman & Sterling LLP 599 Lexington Avenue New York, NY 10022	Will Call	Mr. Karp, the President and Chief Executive Officer of S&S, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between Penguin Random House (“PRH”) and S&S for anticipated top-selling books, the proposed transaction between PRH and S&S, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
6.	<b>Markus Dohle</b> c/o Daniel M. Petrocelli, Esq. O’Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067	Will Call	Mr. Dohle, the Chairman and Chief Executive Officer of PRH and Member of the Executive Board for Bertelsmann, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between PRH and S&S for anticipated top-selling books, the proposed transaction between PRH and S&S, and the likely effects of the proposed transaction on the market for anticipated top-selling books.

#	Name and Address of Witness Testifying Live	Will Call/ May Call	Description of Expected Testimony
7.	<b>William Thomas</b> c/o Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067	May Call	Mr. Thomas, Executive Vice President of PRH and the Publisher and Editor-in-Chief of Doubleday, a PRH imprint, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between PRH and S&S for anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
8.	<b>Madeline McIntosh</b> c/o Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067	May Call	Ms. McIntosh, the Chief Executive Officer of Penguin Random House U.S., is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between PRH and S&S for anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
9.	<b>Don Weisberg</b> c/o Joel Mitnick, Esq. Cadwalader, Wickersham & Taft LLP 200 Liberty Street New York, NY 10281	Will Call	Mr. Weisberg, the CEO of Macmillan Publishers, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
10.	<b>Jessica Watterson</b> Sandra Dijkstra Literary Agency 1155 Camino Del Mar, PMB 515 Del Mar, CA 92014	May Call	Ms. Watterson, an agent, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are sold to publishers, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.

#	Name and Address of Witness Testifying Live	Will Call/ May Call	Description of Expected Testimony
11.	<b>Brian Tart</b> c/o Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067	May Call	Mr. Tart, the President and Publisher of Viking and Penguin, which are both PRH imprints, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between PRH and S&S for anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
12.	<b>Brian Murray</b> c/o Steven G. Mintz, Esq. Mintz & Gold LLP 600 Third Avenue, 25th Floor New York, NY 10016	Will Call	Mr. Murray, the President and Chief Executive Officer of HarperCollins Publishers, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
13.	<b>Wendy Wolf</b> c/o Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067	May Call	Ms. Wolf, Vice President for PRH and Associate Publisher and Editorial Director of Nonfiction for Viking, a PRH imprint, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between PRH and S&S for anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.



#	Name and Address of Witness Testifying Live	Will Call/ May Call	Description of Expected Testimony
14.	<b>Geoffrey Kloske</b> c/o Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067	May Call	Mr. Kloske, the President and Publisher of Riverhead, a PRH imprint, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between PRH and S&S for anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
15.	<b>John Glusman</b> c/o Lance Koonce, Esq. Klaris Law PLLC 29 Little West 12th Street New York, NY 10014	May Call	Mr. Glusman, Vice President and Editor-in-Chief of the Trade Division for W.W. Norton & Company, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
16.	<b>Kent Wolf</b> c/o Richard Kaye, Esq. Phillips Nizer LLP 485 Lexington Avenue New York, NY 10017	May Call	Mr. Wolf, an agent, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are sold to publishers, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
17.	<b>Katherine McKean Landon</b> Howard Morhaim Literary Agency 30 Pierrepont Street Brooklyn, NY 11201	May Call	Ms. Landon, an agent, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are sold to publishers, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.

#	Name and Address of Witness Testifying Live	Will Call/ May Call	Description of Expected Testimony
18.	<b>Adriana Porro</b> c/o John Read United States Department of Justice Antitrust Division 450 Fifth Street, NW, Suite 4000 Washington, DC 20530	Will Call	Ms. Porro, a statistician in the Antitrust Division of the U.S. Department of Justice, is expected to testify about the preparation of summaries describing the acquisition process for certain anticipated top-selling books.
19.	<b>Nicholas Hill, Ph.D.* †</b> Bates White Economic Consulting 2001 K Street NW North Building, Suite 500 Washington, DC 20006	Will Call	Dr. Hill, an economic expert for the United States, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, the characteristics of firms that purchase anticipated top-selling books, the likely effects of the proposed transaction on the market for anticipated top-selling books, and the arguments presented by Defendants in defense of the proposed transaction, including claimed efficiencies.  Dr. Hill is anticipated to testify both in the United States' case-in-chief and in its rebuttal case.
20.	<b>Nina von Moltke †</b> c/o Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067	May Call	Ms. von Moltke, the President and Director of Strategic Development for PRH U.S., is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between PRH and S&S for anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
21.	<b>Christine Hammer *†</b> Cornerstone Research 1000 El Camino Real # 250, Menlo Park, CA 94025	May Call	Ms. Hammer, an accounting expert for the United States, is expected to testify about the efficiencies that Defendants claim will result from the proposed transaction.

In addition, the United States anticipates calling the following witnesses via presentation of designated deposition testimony (these witnesses are presented below grouped by “Will Call” and “May Call,” with each group in alphabetical order).

The United States anticipates presenting testimony from the below witnesses during the course of its case-in-chief in a manner that makes the most efficient use of the Court’s time:

#	Name and Address of Witness Testifying via Deposition Testimony	Will Call/ May Call	Description of Expected Testimony
1.	<b>Michael Jacobs</b> c/o David S. Korzenik, Esq. Miller Korzenik Sommers Rayman LLP 1501 Broadway, Suite 2015 New York, NY 10036	Will Call	Mr. Jacobs, the President and CEO of Abrams Books, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
2.	<b>Steven Zacharius</b> c/o Robert Kidwell, Esq. Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. 555 12th Street NW, Suite 1100 Washington, DC 20004	Will Call	Mr. Zacharius, the President and CEO of Kensington Books, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
3.	<b>Alex Berkett</b> c/o Stephen Fishbein, Esq. Shearman & Sterling LLP 599 Lexington Avenue New York, NY 10022	May Call	Mr. Berkett, Executive Vice President and Chief Corporate Development Strategy Officer for Paramount Global, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, the characteristics of firms that purchase anticipated top-selling books, the proposed transaction between PRH and S&S, and the likely effects of the proposed transaction on the market for anticipated top-selling books.



#	Name and Address of Witness Testifying via Deposition Testimony	Will Call/ May Call	Description of Expected Testimony
4.	<b>David Drake</b> c/o Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067	May Call	Mr. Drake, the President of Crown, a PRH imprint, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between PRH and S&S for anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
5.	<b>Christy Fletcher</b> c/o Noah Pinegar, Esq. Paul Hastings LLP 2050 M Street, NW Washington, DC 20036	May Call	Ms. Fletcher, an agent, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
6.	<b>Nan Graham</b> c/o Stephen Fishbein, Esq. Shearman & Sterling LLP 599 Lexington Avenue New York, NY 10022	May Call	Ms. Graham, Senior Vice President for S&S and Publisher of Scribner, an S&S imprint, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between PRH and S&S for anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
7.	<b>Andrew Solomon</b> c/o Darren Johnson, Esq. Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019-6064	May Call	Mr. Solomon, an author, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.

#	Name and Address of Witness Testifying via Deposition Testimony	Will Call/ May Call	Description of Expected Testimony
8.	<b>Liate Stehlik</b> c/o Steven G. Mintz, Esq. Mintz & Gold LLP 600 Third Avenue, 25th Floor New York, NY 10016	May Call	Ms. Stehlik, the President and Publisher of the Morrow Group within HarperCollins Publishers, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.
9.	<b>Andrew Ward</b> c/o Daniel M. Petrocelli, Esq. O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067	May Call	Mr. Ward, an Executive Vice President of PRH and Publisher for Random House, a PRH imprint, is expected to testify about the likely effects of the proposed transaction, including at least: the characteristics of anticipated top-selling books, how anticipated top-selling books are acquired, the characteristics of firms that purchase anticipated top-selling books, competition between PRH and S&S for anticipated top-selling books, and the likely effects of the proposed transaction on the market for anticipated top-selling books.