

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
Western Division**

ROSIE D. et al.,)	
)	
on behalf of themselves and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	NO. 01-CV-30199-MAP
)	
MITT ROMNEY et al.,)	
)	
Defendants.)	
)	

DEFENDANTS' REVISED WITNESS LIST

Defendants submit this revised witness list pursuant to the Court's Further Scheduling Order dated December 16, 2004. All witnesses on this revised list were previously identified in Defendants' Pretrial Memorandum dated December 9, 2004. This revised witness list identifies (A) those witnesses whom defendants definitely intend to call at trial, and (B) those witnesses whom defendants may call if their testimony would be responsive to testimony or evidence offered by plaintiffs during their case. Defendants reserve the right to call other witnesses identified in their December 9, 2004 Pretrial Memorandum if relevant to testimony or evidence offered by plaintiffs during their case.

A. Witnesses Whom Defendants Intend to Call at Trial

1. Bannish, Jayne. Massachusetts Behavioral Health Partnership, 489 Whitney Ave., Holyoke, MA 01040. Intensive Case Manager for Sheena M., Devin E., Joshua D.

2. Betts, Kathleen D. Director, Child/Adolescent Services, Massachusetts Behavioral Health Partnership, 286 Congress St., 7th Floor, Boston MA, 02210. Behavioral health services provided to children by MBHP.
3. Bickman, Leonard. 6607 Ormond Drive, Nashville, TN 37205. As set forth in his expert reports and deposition.
4. Fields, Suzanne. Massachusetts Behavioral Health Partnership, 286 Congress St., 7th Floor, Boston MA, 02210. Behavioral health services provided to children by MBHP, and specifically the CFFC program.
5. Foster, E. Michael. Dept. of Health Policy and Administration, The Methodology Center, College of Health and Human Development, The Pennsylvania State University, University Park, PA 16802. As set forth in his rebuttal report, deposition and affidavit.
6. Goldstein, Richard. 37 Kirkwood Road, Brighton, MA 02135. As set forth in his rebuttal report, deposition and affidavit.
7. Greenstein, Bruce D. Associate Regional Administrator, Department of Health and Human Services, Centers for Medicare and Medicaid Services, Division of Medicaid and Children's Health - Region 1, JFK Federal Building - Government Center, Room 2275, Boston, MA 02203. Behavioral health services eligible for federal financial participation.
8. Grimes, Katherine. Neighborhood Health Plan, 253 Summer St., Boston, MA 02210. MHSPY program.
9. Kaegebein, Deborah. Director of Specialized Care Management and MCPAP Project Manager, Massachusetts Behavioral Health Partnership, 286 Congress St.,

7th Floor, Boston MA, 02210. Services provided to named plaintiffs and clinical review subjects by MBHP.

10. Magnus, Stephen A. Outcomes Data Manager, Massachusetts Behavioral Health Partnership, 286 Congress St., 7th Floor, Boston MA, 02210. As set forth in his rebuttal report, deposition and affidavit.
11. Maciolek, Susan. Department of Social Services. 24 Farnsworth St., 5th Floor, Boston, MA 02210. Current Massachusetts initiatives with respect to children's mental health, in particular as they relate to the Department of Social Services and its procurement of services.
12. Metz, W. Peter, M.D.. Department of Psychiatry, UMass Memorial Medical Center, 55 Lake Avenue North, Worcester MA 01655. As set forth in his rebuttal report and deposition.
13. Mikula, Joan. Department of Mental Health, 25 Staniford St., Boston MA 02114. Current Massachusetts initiatives with respect to children's mental health, and in particular as they relate to the Department of Mental Health and to "stuck kids."
14. Norton, Michael. Deputy Commissioner, MassHealth Behavioral Health Programs Unit, EOHHS, OAAC, 5th Floor, One Ashburton Pl., Boston, MA 02108. Behavioral health services available to Medicaid eligible children in Massachusetts.
15. Preston, Ron. Secretary, Executive Office of Health and Human Services, One Ashburton Pl., Boston, MA 02108. Current Massachusetts initiatives with respect to children's mental health; relationship between federal and state Medicaid programs.

16. Straus, John, M.D.. Massachusetts Behavioral Health Partnership, 286 Congress St., 7th Floor, Boston MA, 02210. Behavioral health services provided to children by MBHP; Children's Psychiatry Access Project.
17. Wentworth, Bob. Director of Integrated Services, Department of Social Services. 24 Farnsworth St., 5th Floor, Boston, MA 02210. Current Massachusetts initiatives with respect to children's mental health, in particular as they relate to the Department of Social Services and its procurement of services.

B. Witnesses Whom Defendants May Call.

Defendants may call the following witnesses, who have personal knowledge concerning the named plaintiffs and the children who were subjects of plaintiffs' experts' clinical review. Whether they are called will depend on the nature and amount of the testimony and evidence offered by plaintiffs concerning particular named plaintiffs or children who were subjects of plaintiffs' experts' clinical review:

18. Belkin, Debi. Department of Social Services, Greenfield Area Office, One Arch Place, 1st Floor, Greenfield, MA 01301. Supervisor for Sarah B.
19. Bennett, June. Department of Social Services, Hyde Park Area Office, 1530 River Street, Hyde Park, MA 02136. Supervisor for Janice B.
20. Birmingham, Phyllis. Department of Mental Health, 25 Staniford St., Boston MA 02114. Supervisor, Western Massachusetts region.
21. Bolduc, Peter. Department of Social Services, Hyde Park Area Office. 1530 River Street, Hyde Park, MA, 02136. Supervisor for Jennifer C.
22. Brown, Bill. Department of Social Services, Park Street Area Office, 30 Dimock St., Roxbury MA 02119. Area Director for Ralph B.

23. Bushee, Carol. Department of Social Services, Lynn Area Office, 20 Wheeler St., Lynn, MA 01902. Social worker for Terrance M.
24. Casella, Kathy. Department of Mental Health, 25 Staniford St., Boston MA 02114. Case manager for Sheena M.
25. Chapman, Bill. Department of Mental Retardation, 333 East St., 5th Floor, Pittsfield, MA 01201. Service coordinator for Sheena M.
26. Chwaliszewski, Helen. Department of Social Services, Lynn Area Office, 20 Wheeler St., Lynn, MA 01902. Supervisor for Terrance M.
27. Collins, Joe. Department of Social Services, Greenfield Area Office, One Arch Place, 1st Floor, Greenfield, MA 01301. Area Director for Sarah B. and Chelsea T.
28. Connelly, Susan. Department of Social Services, Hyde Park Area Office, 1530 River St., Hyde Park, MA 02136. Area program manager for Jose M.
29. Curley, Barbara. Department of Social Services, Hyde Park Area Office, 1530 River Street, Hyde Park, MA 02136. Area Director for Janice B., Jennifer C., Jose M.
30. D'Agastino, Sophia. Department of Social Services, Lowell Area Office. 33 E. Merrimack St., Lowell, MA 01852. Area program manager for Kristin P.
31. Dame, Kathy Ann. Department of Social Services, Lawrence Area Office. Everett Mills, 15 Union St., 2nd Floor, Lawrence, MA 01840. Supervisor for Christine Q-R.
32. Dellaguistina, Denise. Department of Social Services, Springfield Area Office. 1537 Main St., 4th Floor. Springfield, MA 01103. Supervisor for Shentelle G.

33. Diraffaele, Bonita. Department of Social Services, Lynn Area Office, 20 Wheeler St., Lynn, MA 01902. Supervisor for Terrance M.
34. Donahue, Michelle. Department of Social Services, Brockton Area Office, 110 Mulberry St., Brockton, MA 02302. Social worker for John M.
35. Doublas, Theodore. Department of Social Services, Hyde Park Area Office. 1530 River Street, Hyde Park, MA, 02136. Social Worker for Jennifer C.
36. Doyle, Jack. Department of Social Services, Lynn Area Office, 20 Wheeler St., Lynn, MA 01902. Area Director for Terrance M. and Christine Q-R.
37. Elser, Barbara. Department of Social Services, Cambridge Area Office. 810 Memorial Drive, Cambridge MA 02139. Area program manager for Danielle H.
38. Fagan, Nancy. Department of Social Services, Haverill Area Office, 3 Ferry St., Bradford, MA 01835. Area director for Matthew H.
39. Farrell, Elaine. Department of Social Services, Brockton Area Office, 110 Mulberry St., Brockton, MA 02302. Area Program Manager for John M.
40. Finch, Karen. Department of Social Services, Greenfield Area Office, One Arch Place, 1st Floor, Greenfield, MA 01301. Social worker for Chelsea T.
41. Gearin-Axford, Lee Ann. Department of Social Services. Lawrence Area Office, Everett Mills, 15 Union St., 2nd Floor, Lawrence, MA 01840. Social worker for Marc S.
42. Gilberti, Margie. Department of Social Services, Greenfield Area Office, One Arch Place, 1st Floor, Greenfield, MA 01301. Area Program Manager for Sarah B. and Chelsea T.
43. Gray, Shanna Bullock. Department of Mental Health, 25 Staniford St., Boston

- MA 02114. Case manager for Anton B.
44. Gresh, Christine. Department of Social Services, Springfield Area Office. 1537 Main St., 4th Floor. Springfield, MA 01103. Area Program Manager for Shentelle G.
 45. Grillo, Katherine. Department of Social Services, Haverill Area Office, 3 Ferry St., Bradford, MA 01835. Supervisor for Matthew H.
 46. Guillermo, Ceylin. Department of Social Services, Lawrence Area Office, Everett Mills, 15 Union St., 2nd Floor, Lawrence, MA 01840. Social Worker for Tashira F-R.
 47. Harris, Catherine. Department of Social Services, Harbor Area Office. 45 Spruce St., Chelsea MA 02150. Area program manager for Forrest W.
 48. Hatch, Doreen. Department of Social Services, Lowell Area Office. 33 E. Merrimack St., Lowell, MA 01852. Area director for Kristin P.
 49. Henriquez, Lucy. Department of Social Services. Lawrence Area Office, Everett Mills, 15 Union St., 2nd Floor, Lawrence, MA 01840. Supervisor for Giovanni S.
 50. Herman, Amy. Department of Mental Health, 25 Staniford St., Boston MA 02114. Case manager for Tyriek H-R.
 51. Ho, Richard. Department of Social Services, Cambridge Area Office. 810 Memorial Drive, Cambridge MA 02139. Area Director for Danielle H.
 52. Hsu, Tanya. Department of Social Services, Lawrence Area Office. Everett Mills, 15 Union St., 2nd Floor, Lawrence, MA 01840. Social worker for Christine Q-R.
 53. Huntington, Rick. Department of Mental Retardation, 333 East St., 5th Floor,

- Pittsfield, MA 01201. Area supervisor for Joshua D., Devin E., Sheena M.
54. Jean-Smith, Ermolande. Department of Social Services, Hyde Park Area Office, 1530 River St., Hyde Park, MA 02136. Social worker for Vanessa W.
 55. Joyce, Christine. Department of Social Services, Brockton Area Office, 110 Mulberry St., Brockton, MA 02302. Area Director for John M.
 56. Laundre, Glenn. Department of Social Services, Lawrence Area Office. Everett Mills, 15 Union St., 2nd Floor, Lawrence, MA 01840. Area program manager for Christine Q-R. and Giovanni S.
 57. Lefkowitz, Jane. Department of Mental Health, 25 Staniford St., Boston MA 02114. Case manager for Joshua D.
 58. Linnane, Denise. Department of Social Services, Hyde Park Area Office. 1530 River Street, Hyde Park, MA, 02136. Social Worker for Jennifer C.
 59. MacDonald, Robert Allen. Department of Social Services, Park Street Area Office, 30 Dimock St., Roxbury MA 02119. Supervisor for Ralph B.
 60. Madigan, J. Department of Social Services, Coastal Area Office, 541 Main Street, South Weymouth, MA 02190. Supervisor for Mark C.
 61. Maker, Robert. Department of Social Services, Haverill Area Office, 3 Ferry St., Bradford, MA 01835. Area program manager for Matthew H.
 62. Markley, Debra. Department of Mental Health, 25 Staniford St., Boston MA 02114. Case manager for Richard G.
 63. Marquis, Catherine. Department of Social Services, Lawrence Area Office, Everett Mills, 15 Union St., 2nd Floor, Lawrence, MA 01840. Supervisor for Tashira F-R. and Marc S.

64. McDermott, Ruth. Department of Social Services Harbor Area Office. 45 Spruce St., Chelsea, MA 02150. Area Director for Laura D. and Forrest W.
65. McNeil, Laurie. Department of Social Services, Lawrence Area Office, Everett Mills, 15 Union St., 2nd Floor, Lawrence, MA 01840. Area Program Manager for Tashira F-R. and Marc S.
66. Nolan, Donna. Department of Mental Health, 25 Staniford St., Boston MA 02114. Case manager for Trudy G.
67. O'Neil, Johnathan. Department of Social Services, Cape and Islands Area Office. 500 Main St., Hyannis, MA 02601. Social worker for Christopher T.
68. Passerini, Alba. Department of Mental Health, 25 Staniford St., Boston MA 02114. Case manager for Roselin D.
69. Pasternak, Bree. Department of Social Services, Cambridge Area Office. 810 Memorial Drive, Cambridge MA 02139. Supervisor for Danielle H.
70. Pillidge, Raymond. Department of Social Services, Lawrence Area Office, Everett Mills, 15 Union St., 2nd Floor, Lawrence, MA 01840. Area Director for Tashira F-R., Marc S, Giovanni S.
71. Pratt, Dorine. Department of Social Services. Lawrence Area Office, Everett Mills, 15 Union St., 2nd Floor, Lawrence, MA 01840. Social worker for Giovanni S.
72. Rodrigues, Dina. Department of Social Services, Cambridge Area Office. 810 Memorial Drive, Cambridge MA 02139. Social Worker for Danielle H.
73. Roy, Donald. Department of Social Services, Lowell Area Office. 33 E. Merrimack St., Lowell, MA 01852. Supervisor for Kristin P.

74. Rudolph-Garlow, Leslie. Department of Mental Retardation, 333 East St., 5th Floor, Pittsfield, MA 01201. Service coordinator supervisor for Joshua D., Devin E., Sheena M.
75. Ryan, Steve. Department of Social Services, Cape and Islands Area Office. 500 Main St., Hyannis, MA 02601. Area Director for Christopher T.
76. Sanford, Gregory. Department of Social Services, Hyde Park Area Office. 1530 River St., Hyde Park, MA 02136. Social worker for Jose M.
77. Scantlebert, Grace. Department of Social Services, Park Street Area Office, 30 Dimock St., Roxbury MA 02119. Area Program Manager for Ralph B.
78. Scollin, Lisa. Department of Social Services, Lowell Area Office. 33 E. Merrimack St., Lowell, MA 01852. Social worker for Kristin P.
79. Shammas, Norma. Department of Mental Retardation, 333 East St., 5th Floor, Pittsfield, MA 01201. Service coordinator for Joshua D. and Devin E.
80. Simmons, Bill. Department of Social Services, Greenfield Area Office, One Arch Place, 1st Floor, Greenfield, MA 01301. Supervisor for Chelsea T.
81. Slater, Catherine. Department of Social Services, Springfield Area Office. 1537 Main St., 4th Floor. Springfield, MA 01103. Social Worker for Shentelle G.
82. Smith, Arlene. Department of Social Services, Springfield Area Office. 1537 Main St., 4th Floor. Springfield, MA 01103. Area Director for Shentelle G.
83. Stanton, Linda. Department of Mental Health, 25 Staniford St., Boston MA 02114. Former supervisor for Mark Cram; case manager for Robert T.
84. Staten, Paul. Department of Social Services, Haverill Area Office, 3 Ferry St., Bradford, MA 01835. Social worker for Matthew H.

85. Taylor, Martha. Department of Social Services, Hyde Park Area Office, 1530 River Street, Hyde Park, MA 02136. Area Program Manager for Janice B. and Jennifer C.
86. Tejada, Lori. Department of Social Services, Hyde Park Area Office, 1530 River Street, Hyde Park, MA 02136. Social Worker for Janice B.
87. Terranov, Michael. Department of Social Services, Harbor Area Office. 45 Spruce St., Chelsea MA 02150. Social worker for Forrest W.
88. Tilden, Christopher. Department of Mental Health, 25 Staniford St., Boston MA 02114. Case manager for Shaun E., former case manager for Mark C.
89. Toole, Carolyn. Department of Mental Health, 25 Staniford St., Boston MA 02114. Case manager for Laura D.
90. Trainor, Erin. Department of Social Services, Coastal Area Office, 541 Main Street, South Weymouth, MA 02190. Social Worker for Mark C.
91. Vadeboncoeur, Lawrence. Department of Social Services, Cape and Islands Area Office. 500 Main St., Hyannis, MA 02601. Supervisor for Christopher T.
92. Vesey, Marianne. Department of Mental Health, 25 Staniford St., Boston MA 02114. Former case manager for Trudy G.
93. Wagner, Doug. Department of Social Services, Cape and Islands Area Office. 500 Main St., Hyannis, MA 02601. Area program manager for Christopher T.
94. Weeks, Ronald. Department of Social Services, Hyde Park Area Office. 1530 River St., Hyde Park, MA 02136. Supervisor for Jose M.
95. Whorl, Dale. Department of Social Services, Greenfield Area Office, One Arch Place, 1st Floor, Greenfield, MA 01301. Social Worker for Sarah B.

96. Wilson, Karen. Department of Social Services, Harbor Area Office. 45 Spruce St., Chelsea MA 02150. Supervisor for Forrest W.
97. Yearwood, Patricia. Department of Social Services, Park Street Area Office, 30 Dimock St., Roxbury MA 02119. Social worker for Ralph B.

Respectfully submitted,

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ATTORNEY GENERAL

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Date: March 4, 2005

Certificate Concerning Service

I, Deirdre Roney, hereby certify that on today's date I served a copy of this document on counsel for plaintiffs electronically and by regular mail.

/s/ Deirdre Roney
Deirdre Roney