

Exs. 1-143: The following attached exhibits are true and accurate copies of the documents described below, consisting primarily of documents produced from Wal-Mart Stores, Inc. to Plaintiffs and excerpts of deposition testimony taken in this case. In addition, Exhibit 87 is excerpts from a book written by Sam Walton, founder of Wal-Mart; Exhibit 97 is one of Wal-Mart's responses to written interrogatories; and Exhibit 125 is a map prepared at counsel's request, which identifies with a pinpoint each Wal-Mart facility about which a declarant has provided testimony relevant to plaintiffs' motion.

- [Exhibit 1](#) Deposition of Kevin Harper, designated under Rule 30(b)(6) to testify about Wal-Mart Organizational Structure
- [Exhibit 2](#) Deposition of Jeff Reeves, designated under Rule 30(b)(6) to testify about Sam's Club Organizational Structure
- [Exhibit 3](#) Deposition of Vincent Martinez
- [Exhibit 4](#) Deposition of John Butler
- [Exhibit 5](#) Deposition of Trent Burner, designated under Rule 30(b)(6) to testify about Validation
- [Exhibit 6](#) Deposition of Marcus Ludwig
- [Exhibit 7](#) Deposition of Roxanne Wigger, designated under Rule 30(b)(6) to testify about Management
- [Exhibit 8](#) Deposition of Gisel Ruiz
- [Exhibit 9](#) Deposition of Kimberly Weaver, designated under Rule 30(b)(6) to testify about Wal-Mart Hourly Promotions
- [Exhibit 10](#) Deposition of Dianna Eldridge, designated under Rule 30(b)(6) to testify about Sam's Club Salaried Promotions
- [Exhibit 11](#) Deposition of Kevin Harper
- [Exhibit 12](#) Deposition of Brad Schaffner
- [Exhibit 13](#) Deposition of Debra Kintzele, designated under Rule 30(b)(6) to testify about Wal-Mart Salaried Promotions
- [Exhibit 14](#) Deposition of Celia Swanson
- [Exhibit 15](#) Deposition of Tom Coughlin
- [Exhibit 16](#) Deposition of Coleman Peterson
- [Exhibit 17](#) Deposition of Larry Williams
- [Exhibit 18](#) Deposition Jim Haworth
- [Exhibit 19](#) Deposition of Mina Fielek, designated under Rule 30(b)(6) to testify about Document Retention Policies and Practices
- [Exhibit 20](#) Deposition of Michael Annatone
- [Exhibit 21](#) Deposition of Phil Goodwin
- [Exhibit 22](#) Deposition of Kirk Guthrie, designated under Rule 30(b)(6) to testify about Promotions in Tire Lube Express
- [Exhibit 23](#) Deposition of Danny Carter
- [Exhibit 24](#) Deposition of Meng Tang, designated under Rule 30(b)(6) to testify about E-mail and Intranet Systems
- [Exhibit 25](#) Deposition Lisa Heilman, designated under Rule 30(b)(6) to testify about Wal-Mart Salaried Promotions
- [Exhibit 26](#) Deposition of Art Mireles

<u>Exhibit 27</u>	Deposition of Melinda Hass, designated under Rule 30(b)(6) to testify about Personnel Policies
<u>Exhibit 28</u>	Deposition of Maxie Carpenter
<u>Exhibit 29</u>	Deposition of Sheri Hottinger, designated under Rule 30(b)(6) to testify about Communications and Monitoring
<u>Exhibit 30</u>	Deposition of Ulonda Crawford, designated under Rule 30(b)(6) to testify about Sam's Club Compensation
<u>Exhibit 31</u>	Deposition of Craig Arnold, designated under Rule 30(b)(6) to testify about Wal-Mart Compensation policies and practices
<u>Exhibit 32</u>	Deposition of Ramona Muzingo, designated under Rule 30(b)(6) to testify about Wal-Mart Culture
<u>Exhibit 33</u>	Deposition of Jeffrey Reeves
<u>Exhibit 34</u>	Deposition of Janice Van Allen, designated under Rule 30(b)(6) to testify about Wal-Mart Management Training
<u>Exhibit 35</u>	Deposition of Brian Poland
<u>Exhibit 36</u>	Deposition of Rhonda Harper
<u>Exhibit 37</u>	Deposition of Alan Oshier
<u>Exhibit 38</u>	Deposition of Kendall Schwindt
<u>Exhibit 39</u>	Deposition of Rose Reza
<u>Exhibit 40</u>	Deposition of David Riggs
<u>Exhibit 41</u>	Deposition of Jesse James Brown
<u>Exhibit 42</u>	Deposition of Bernard Seaman
<u>Exhibit 43</u>	Deposition of John Sherman
<u>Exhibit 44</u>	Deposition of Jonathan Sims
<u>Exhibit 45</u>	Deposition of Sharon Bilgischer
<u>Exhibit 46</u>	Deposition of Kenneth Shatz, designated under Rule 30(b)(6) to testify about Wal-Mart Field Compensation for Hourly Employees
<u>Exhibit 47</u>	Deposition of John Scantlin
<u>Exhibit 48</u>	Deposition of Marvin Raps
<u>Exhibit 49</u>	Deposition of Shelly Heinle, designated under Rule 30(b)(6) to testify about Compensation for Shoes and Jewelry
<u>Exhibit 50</u>	Deposition of Pamela Simpson, designated under Rule 30(b)(6) to testify about Wal-Mart Field Compensation for Salaried Employees
<u>Exhibit 51</u>	Deposition of Dawn Blackburn, designated under Rule 30(b)(6) to testify about Sam's Club Field Compensation for Hourly Employees
<u>Exhibit 52</u>	Deposition of Craig McNair, designated under Rule 30(b)(6) to testify about Sam's Club Field Compensation for Salaried Employees
<u>Exhibit 53</u>	Deposition of Bob Monfils
<u>Exhibit 54</u>	Deposition of Michael Miller
<u>Exhibit 55</u>	Deposition of Jill Wesbecher
<u>Exhibit 56</u>	Deposition of William Bielby
<u>Exhibit 57</u>	Deposition of Mark Bosler
<u>Exhibit 58</u>	Deposition of Janet Mitchell
<u>Exhibit 59</u>	Deposition of Cheryl Lippert
<u>Exhibit 60</u>	Deposition of Tom Grimm

<u>Exhibit 61</u>	Deposition of Pat Curran, designated under Rule 30(b)(6) to testify about the Resident Assistant Manager Program
<u>Exhibit 62</u>	Deposition of Don Harris
<u>Exhibit 63</u>	Deposition of Mickey Anderson
<u>Exhibit 64</u>	Deposition of John Kocharian
<u>Exhibit 65</u>	Deposition of Cathy Bishop
<u>Exhibit 66</u>	Deposition of Sandy Ellison
<u>Exhibit 67</u>	Deposition of Charlyn Jarrells-Porter
<u>Exhibit 68</u>	Deposition of Gregg Spragg
<u>Exhibit 69</u>	Deposition of Brenda Deno
<u>Exhibit 70</u>	Wal-Mart 10-K 2003
<u>Exhibit 71</u>	Sam's Club Organizational Charts, WMHO 157785-157802
<u>Exhibit 72</u>	RPM Responsibilities, WMHO 369676-369677
<u>Exhibit 73</u>	Deposition of James Winkler
<u>Exhibit 74</u>	Job Descriptions, WMHO 157836 - 157837, WMHO 157856-157863, WMHO 158104-158109, WMHO 158093-158099, WMHO 157955-157961, WMHO 157974-157975, WMHO 157936-157938, WMHO 157971-157973, WMHO 157939-157940
<u>Exhibit 75</u>	Wal-Mart Stores Matrix of Essential Job Functions, WMHO 007136-0007137
<u>Exhibit 76</u>	Wal-Mart Corporate Policy: Support Managers, WMHO 217131-217133
<u>Exhibit 77</u>	Memo re: New Management Training Program, WMHO 645625-645626
<u>Exhibit 78</u>	Deposition of Rebecca Carter
<u>Exhibit 79</u>	2001 Company Accountability Goals, WMHO 161463-161475
<u>Exhibit 80</u>	Wal-Mart Culture Pocket Handbook, WMHO 642774-642785
<u>Exhibit 81</u>	Associate Handbook, WMHO 000001-0000050
<u>Exhibit 82</u>	Culture Topics Index, WMHO 598668
<u>Exhibit 83</u>	Culture & History, WMHO 598669-598684
<u>Exhibit 84</u>	Saturday Meeting Notes, WMHO 715195-715255
<u>Exhibit 85</u>	Management Performance Appraisal, WMHO 897429-897432
<u>Exhibit 86</u>	Management Training Program Week 1 Trainee Guide, WMHO 214660-214674
<u>Exhibit 87</u>	Walton and Huey, Made in America, 1992
<u>Exhibit 88</u>	Diversity Management Inc. Memo, WMHO 734090-734105
<u>Exhibit 89</u>	Diversity Questions Walton Institute, WMHO 7152587-715289, 715256-715260
<u>Exhibit 90</u>	Memo re: Women in Leadership, WMHO 160584-160585
<u>Exhibit 91</u>	Memo re: Management Wages, WMHO 150351
<u>Exhibit 92</u>	Assistant Manager & Fresh Managers Performance Matrix and Salary Structure, WMHO 376996
<u>Exhibit 93</u>	Field Associate Compensation Guidelines 1997, WMHO 151972-151986
<u>Exhibit 94</u>	FYE 2003 Field Non-Exempt Associate Pay Guidelines, WMHO 366900-366919
<u>Exhibit 95</u>	FYE 2002 Field Exempt Associate Pay Guidelines, WMHO 205228-205256
<u>Exhibit 96</u>	Job Announcements Company Policy, WMHO 217434-217435

- [Exhibit 97](#) Defendant's Supplemental Objections and Answers to Plaintiffs' First and Second Sets of Interrogatories
- [Exhibit 98](#) Promotional Guidelines, WMHO 158522-158523, WMHO 220459-220460
- [Exhibit 99](#) Training Resources: Rising Star, WMHO 217265-217280
- [Exhibit 100](#) Email from Jarrells Porter re: Urgent Project, WMHO 649821
- [Exhibit 101](#) Emails re: MCS, WMHO 731355-731363
- [Exhibit 102](#) MCS RPM Training, WMHO 377998-378031
- [Exhibit 103](#) Wal-Mart Stores Career Opportunities, WMHO 714868
- [Exhibit 104](#) Gap Analysis, WMHO 665710-665711
- [Exhibit 105](#) Divison 1 Operations Gap Analysis/ Action Plan, WMHO 665703-665709
- [Exhibit 106](#) Fourth Quarter Diversity Representation Total Management, WMHO 733025-733037
- [Exhibit 107](#) Diversity Report FY 00 1st Quarter YTD, WMHO 733376-733383
- [Exhibit 108](#) 7/15/99 Email and Attachment re: Diversity Presentation, WMHO 733384-733402
- [Exhibit 109](#) 10/2/01 Email and Attachment re: Cole's Board Presentation, WMHO 733161-733170
- [Exhibit 110](#) Retail Benchmarks on Diversity, WMHO 160312-160319
- [Exhibit 111](#) Bentonville '99 People Strategic Planning Session, WMHO 363376-363453
- [Exhibit 112](#) 3/4/99 Minutes of Meeting of the Compensation and Nominating Committee of the Board of Directors, WMHO 502697-502705
- [Exhibit 113](#) 6/1/00 Minutes of Meeting of the Compensation and Nominating Committee of the Board of Directors, WMHO 502679-502684
- [Exhibit 114](#) Memo re: 2000 Catalyst Census of Woman Corporate Officers and Top Earners, WMHO 915835-915837
- [Exhibit 115](#) Email re: Women in Leadership, WMHO 734283
- [Exhibit 116](#) Diversity Ideas, WMHO 365621
- [Exhibit 117](#) Relocation Agreement, WMHO 200512
- [Exhibit 118](#) Email re: Management Relocatability, WMHO 649961-649962
- [Exhibit 119](#) Email re: Response to the Retreat Notes, WMHO 650820
- [Exhibit 120](#) Wal-Mart Stores/Supercenter Minority/Gender Pay Analysis FYE 2000, WMHO 386574-386624
- [Exhibit 121](#) Sam's Club Minority/ Gender Pay Analysis FYE 2000, WMHO 386625-386627
- [Exhibit 122](#) District Manager Average Salary Chart, WMHO 938327
- [Exhibit 123](#) District Manager Average Salary by Time in Position Chart, WMHO 630778
- [Exhibit 124](#) Notice of Annual Meeting of Shareholders, WMHO 1200164-1200167
- [Exhibit 125](#) Map identifying locations of each Wal-Mart facility about which a declarant has provided testimony relevant to plaintiffs' motion.
- [Exhibit 126](#) Excerpt from Wal-Mart employee newsletter with picture of Jim Haworth
- [Exhibit 127](#) Deposition of Ulonda Crawford, designated under Rule 30(b)(6) to testify about Sam's Club Compensation policies and practices

- [Exhibit 128](#) Declaration of Sandra Jean Ellison in Support of Defendant Wal-Mart Stores, Inc.'s Opposition to Motion for Class Certification
- [Exhibit 129](#) Deposition of Joan Haworth, Ph.D.
- [Exhibit 130](#) Deposition of Richard Drogin, Ph.D.
- [Exhibit 131](#) 1999 Field Associate Compensation Guidelines, WMHO151998 - 152012
- [Exhibit 132](#) Deposition of Craig Arnold, designated under Rule 30(b)(6) to testify about Wal-Mart Compensation policies and practices
- [Exhibit 133](#) Declaration of Stanley Presser in Support of Plaintiffs' Motion to Strike Portions of Defendant's Expert Declaration
- [Exhibit 134](#) Posting Notice, previously filed as Exhibit I to the Declaration of David Scott in Opposition to Plaintiffs' Motion for Class Certification
- [Exhibit 135](#) Defendant's Second Supplemental Objections and Responses to Plaintiffs' First Set of Interrogatories
- [Exhibit 136](#) Deposition of Kenneth S. Schatz
- [Exhibit 137](#) Beck v. The Boeing Co., Case No. C-00-301P (W.D. Wash. Dec. 27, 2001)
- [Exhibit 138](#) Deposition of Charlyn Jarrells-Porter
- [Exhibit 139](#) Deposition of Jill Wesbescher
- [Exhibit 140](#) Deposition of Sharon Bilgischer
- [Exhibit 141](#) Deposition of Coleman Peterson
- [Exhibit 142](#) May 21, 2002 Memorandum from Ramona Benson to Coleman Peterson, WMHO 915770
- [Exhibit 143](#) Deposition of William T. Bielby, Ph.D.