

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DISCOVER FINANCIAL SERVICES, DFS
SERVICES, LLC, and DISCOVERY BANK,

Plaintiffs,

v.

VISA U.S.A., INC., VISA INTERNATIONAL
SERVICE ASSOCIATION, MASTERCARD
INCORPORATED, MASTERCARD
INTERNATIONAL INCORPORATED,

Defendants.

Case No. 04-CV-7844 (BSJ)

ECF Case

**DEFENDANTS' PROPOSED JURY INSTRUCTIONS; PROPOSED VERDICT FORM;
AND PROFFER OF JURY INSTRUCTIONS AND VERDICT FORM**

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MASTERCARD INTERNATIONAL INCORPORATED**

Dated: October 1, 2008

Defendants Visa U.S.A., Inc., Visa International Service Association, MasterCard Incorporated and MasterCard International Incorporated respectfully submit the following items, attached as Exhibits A-C:

- A. Defendants' Proposed Jury Instructions;
- B. Defendants' Proposed Special Verdict Form;
- C. Defendants' Proffer of Jury Instructions and Verdict Form for Credit Market

Liability Issues.


Dated: October 1, 2008

Respectfully Submitted,

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