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5 Specially Appearing for
JOHN STEELE
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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 INGENUITY 13 LLC,
12 Plaintiff,
13 v.
14 JOHN DOE,
15 Defendants.

Case No.: CV-12-8333- ODW(JC~~x~~)

**DECLARATION OF
TIMOTHY HALLORAN
IN RESPONSE TO PUTATIVE
JOHN DOE'S REPLY BRIEF**

Judge: Hon. Otis D. Wright, II
Courtroom: 11
Date: April 2, 2013
Time: 10:00 A.M.

Complaint Filed: September 27, 2012
Trial Date: None

19 I, Timothy J. Halloran, declare that:

20 1. I am an attorney duly licensed to practice in all courts of the State of California, and am
21 a Senior Shareholder with the law firm of Murphy, Pearson, Bradley & Feeney, PC, attorneys of record
22 for specially appearing John Steele herein. I have personal knowledge of the information set forth
23 herein below, unless noted as based on information and belief, and if called upon to testify, I could and
24 would competently testify thereto.
25

26 2. Upon information and belief, attached as Exhibit "A" is a true and correct copy of a
27 notarized affidavit by Jacques Nazaire, dated April 18, 2013.
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct and that this Declaration was executed on this 18th day of April 2013, in San
3 Francisco, California.

4 Dated: April 18, 2013

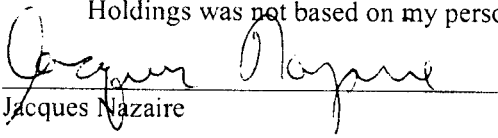
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6 By /s/ Timothy J. Halloran

7 Timothy J. Halloran
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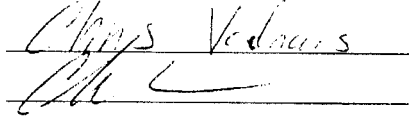
EXHIBIT A

I, Jacques Nazaire, under the penalty of perjury, declare and state:

1. I am over eighteen years of age and am competent to testify as to the matters set forth herein. I make this affidavit on the basis of my personal knowledge and, if called, would be prepared to testify as follows.
2. I am attorney licensed to practice law in the State of Georgia.
3. I have represented AF Holdings LLC in several matters in Georgia.
4. On the occasion when I needed to speak with a representative for AF Holdings LLC, my point of contact was Brett Gibbs, who I understood to be the lead counsel for all the AF Holdings LLC cases nationwide.
5. The only person at AF Holdings LLC that I have spoken to is Mark Lutz, who I understand is the CEO of AF Holdings LLC.
6. I have spoken infrequently to Mr. John Steele over the past years. He has never indicated that he has an ownership interest in any of the clients that I have represented in Georgia, including AF Holdings LLC.
7. I have no reason to believe that Mr. John Steele has any ownership interest in any client I have ever represented.
8. Any statement I may have previously made about John Steele having an interest in AF Holdings was not based on my personal knowledge.


 Jacques Nazaire

Subscribed and sworn to before me, this 18th day of April, 2013


 _____ NOTARY PUBLIC

Name of Notary

My commission expires: Jan 24, 2016.

CHRIS VADNAIS
 NOTARY PUBLIC
 Cobb County
 State of Georgia
 Term Expires Jan. 24, 2016