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5 Attorney for Putative John Doe in 2:12-cv-08333-ODW-JC

6 **UNITED STATES DISTRICT COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA**

8
9 INGENUITY 13, LLC, a Limited
Liability Company Organized Under
10 the Laws of the Federation of Saint
Kitts and Nevis,

11
12 Plaintiff,

13
14 v.

15 JOHN DOE,

16 Defendant.
17

Case Number: 2:12-cv-08333-ODW-JC

Case Assigned to:
District Judge Otis D Wright, II

Discovery Referred to:
Magistrate Judge Jacqueline Chooljian

Case Consolidated with Case Nos.:
2:12-cv-6636; 2:12-cv-6669; 2:12-cv-
6662; 2:12-cv-6668

**DECLARATION OF GRAHAM W.
SYFERT**

DECLARATION OF GRAHAM W. SYFERT

1
2 I, Graham W. Syfert, have personal knowledge of the facts alleged herein and
3 hereby aver as follows:

4 1. I am a member in good standing of the State Bar of Florida, duly
5 admitted to the practice of law in the state and federal courts of the State of Florida.
6

7 2. I have represented various clients in cases brought by the law firm
8 Prenda Law, Inc. Notably, I was counsel of record for a defendant in *Sunlust*
9 *Pictures v. Nguyen*, M.D. Fl. No. 8:12-CV-1685 (“*Sunlust*”) and conducted the
10 hearing wherein Mark Lutz was rebuked by Judge Scriven for attempting to defraud
11 the Court. (See Dec’l. of Morgan E. Pietz re: Prenda Law, Inc., Exhibit N, ECF No.
12 40-2).
13

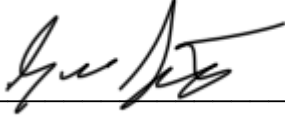
14 3. I have reviewed Exhibit LL (ECF No. 117-2 at pp. 6-20) in the above
15 entitled action and hereby affirm that it is a true and correct copy of John Steele's
16 answer to the Florida bar complaint I filed against him for impersonating a Florida
17 Attorney, Florida Bar File 2012-403511(B), and that document that I received from
18 the Florida Bar in that matter.
19

20 4. Red pen mark asterisks were added next to the section captioned
21 "Affidavit of Mark Lutz" and these asterisk were added by a party other than myself
22 or the Florida Bar. The ECF filing stamps were added to the top of the document
23 upon Mr. Pietz's filing, and footer stamps were added to the bottom of the document
24 (presumably by Mr. Peitz), but no other alterations to the substance of the document
25 has been made
26
27
28

1 I declare under penalty of perjury under the laws of Florida and the United States of
2 America that the foregoing is true and correct.

3
4 Respectfully submitted,

5
6 DATED: April 18th, 2013, executed this day at Duval County, Florida, by

7
8 

9 _____
10 Graham W. Syfert, Declarant