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EXHIBIT A

1 Brett L. Gibbs, Esq. (SBN 251000)
2 38 Miller Avenue, #263
3 Mill Valley, CA 94941
4 415-381-3104
5 brett.gibbs@gmail.com

6 *In Propria Persona*

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

9 **INGENUITY 13 LLC,**

10 *Plaintiff,*

11 v.

12 **JOHN DOE,**

13 *Defendant.*

CASE NO. 2:12-CV-8333-ODW (JCx)

Judge: Hon. Otis D. Wright, II
Magistrate Judge: Hon. Jacqueline Chooljian

DECLARATION OF BRETT L. GIBBS SUPPORTING RESPONSE

14 I, Brett L. Gibbs, declare as follows:

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17 1. I am an attorney at law licensed to practice in California, and admitted in
18 the Ninth Circuit Court of Appeals. My business address is 38 Miller Avenue, #263,
19 Mill Valley, CA, 94941.

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21
22 2. I was not able to pay the Court's attorney's-fee award or secure a bond
23 for the same amount.

24
25 3. Considering my current financial circumstances, I was, and still am,
26 unable to pay that amount.
27
28

1 4. After being diagnosed with brain cancer in July 10, 2009, I was
2 terminated by his law-firm employer.
3

4 5. My bank account has a balance of less than \$500.

5 6. I currently owe more than \$50,000 on a loan I used to pay for my legal
6 education.
7

8 7. I also owe money to other creditors.

9 8. I do not own any real estate or other assets that would allow me to pay
10 the court's fees and costs order or use as collateral for a bond in the required amount.
11

12 9. I did attempt to purchase a supersedeas bond. In discussions with
13 bonding companies over the past two weeks, I have been told that I would have to
14 post cash or real property collateral of at least \$100,000 to obtain a supersedeas bond
15 to stay the amount due in the Court's May 6, 2013 Order.
16

17 10. I do not own any real property or have sufficient other assets that would
18 enable me to secure a bond.
19

20 11. Since working with Prenda Law and Livewire Holdings, LLC –
21 companies I no longer work with – I have been working part time as a contract
22 attorney, but, in that role, I have earned less than \$5,000 total over the span of about
23 two and one-half months.
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12. I have significant ongoing medical expenses for treatment of my brain cancer. Just over the past two months, for instance, I have had to pay approximately \$700.00 in out-of-pocket medical expenses.

13. I am on a heavy supplement regime and a special diet to attempt to suppress the cancer, both of which are very costly. I expect this level of health-related expenditures to continue or increase for the rest of my life in light of my incurable condition.

14. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct based on my own personal knowledge, except for those matters stated on information and belief, and those matters I believe to be true. If called upon to testify, I can and will competently testify as set forth above.

DATED: May 23, 2013.

By: 