

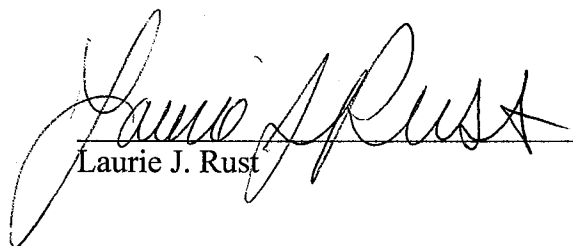
\$1000. An attorney from my office called Defendant and rejected his counter-offer.

4. On November 19, 2007, I left a voicemail message for Defendant, underscoring that Plaintiffs' settlement offer was \$4500, and stated that it would increase when Plaintiffs' counsel prepared discovery or completed any substantive work on this case. On November 26, 2007, I repeated the same voicemail message.

5. On November 28, 2007, I spoke with Defendant. I repeated that Plaintiffs' settlement offer was \$4500, and stated that it would increase if Plaintiffs' counsel had to respond to the three motions Defendant filed on November 23, 2007. Defendant conveyed a counter-offer of \$3,000.

6. Later that afternoon, after consulting with my clients, I rejected Defendant's counter-offer and conveyed to Defendant a reduced settlement offer of \$4,000. I made clear that this was Plaintiffs' final offer; Defendant could accept the settlement offer or Plaintiffs would proceed with litigation. Again, I underscored that the settlement amount would increase if Plaintiffs' counsel had to respond to the three motions Defendant filed on November 23, 2007. Defendant declined the settlement offer.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 19th day of December, 2007.


Laurie J. Rust