

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION**

JOHN WARD, JR.

v.

**CISCO SYSTEMS, INC and
RICK FRENKEL**

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No. 08-4022

DECLARATION OF G. WILLIAM LAVENDER

COUNTY OF MILLER §

STATE OF ARKANSAS §

G. William Lavender declares as follows:

1. My name is G. William Lavender. I am over 18 years of age, of sound mind and am fully competent to make this declaration.
2. The statements herein are true, correct, and based on my personal knowledge. If called to testify as to the matters stated herein, I would and could do so.
3. I graduated from the University of Arkansas Law School in 1971. I have been licensed to practice law in the State of Arkansas since 1971, and I have been licensed to practice law in Texas since 1987. I am also admitted to practice law in the Eastern District of Texas and the Eastern and Western Districts of Arkansas. Many lawyers in the Texarkana area are licensed to practice in both Texas and Arkansas.
4. I am a solo practitioner at Lavender Law located at 210 N. State Line Avenue, Suite 503, Texarkana, Arkansas. The firm is less than one mile from the Texarkana, Texas border. The firm's practice regularly includes handling cases in both Texas and

Arkansas state courts and the local federal courts (the Eastern District of Texas and the Western District of Arkansas), each of which are located in Texarkana.

5. The firm refers cases to other lawyers in both Texarkana, Texas and Texarkana, Arkansas, and it regularly receives referrals from lawyers in both Texarkana, Texas and Texarkana, Arkansas. It has clients from both cities as well as the smaller surrounding cities in both Texas and Arkansas.
6. The Texarkana legal community is one legal community comprised of attorneys from two closely connected cities. The two local bar associations, The Texarkana Bar Association and the Texarkana Young Lawyer's Association, are comprised of and serve lawyers from both Texarkana, Arkansas and Texarkana, Texas. I am a member of the Texarkana Bar Association.
7. Because I have practiced in Texarkana for the last thirty-seven years, I am very familiar with the lawyers practicing in Texarkana. Lawyers practicing in Texarkana consider themselves to be members of a unified legal community—whether those lawyers have offices on the Arkansas side of Texarkana, or on the Texas side. I consider lawyers with offices in Texarkana, Texas to be members of my professional community, and lawyers in Texarkana, Texas would consider my firm, located in Texarkana, Arkansas to be part of the same legal community.
8. Texarkana, Texas and Texarkana, Arkansas are joined not only geographically but socially and economically. The daily lives of citizens of both Texarkana, Texas and Texarkana, Arkansas are often conducted on both sides of the state line. For example, I live in Texarkana, Arkansas, and I regularly attend social functions and events in Texarkana, Texas.

9. The legal community in Texarkana is relatively small, and lawyers on both side of the state line are well known to each other. Members of the Texarkana legal community are regarded as Texarkana lawyers, irrespective of whether the physical location of their law firm is in Texarkana, Arkansas or Texarkana, Texas.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on April 24, 2008.


G. WILLIAM LAVENDER