UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

SCOTT SIDELL,

Plaintiff,

V.

STRUCTURED SETTLEMENT INVESTMENTS,
LP, PLAINTIFF FUNDING HOLDING, INC.
(D/B/A "LAWCASH"), DENNIS SHIELDS,
HARVEY HIRSCHFELD, RICHARD PALMA,
AND SCOTT YUCHT,

Defendants.

July 23, 2008

DECLARATION OF JOHN K. CROSSMAN IN SUPPORT OF MOTION TO COMPEL ARBITRATION, OR ALTERNATIVELY, TO DISMISS

I, John K. Crossman, declare and state under 28 U.S.C. § 1746 as follows:

- 1. I am a member of Zukerman Gore & Brandeis, LLP ("ZGB"), which is counsel to Structured Settlement Investments, LP ("SSI"), Plaintiff Funding Holding, Inc. ("LawCash"), Dennis Shields, Harvey Hirschfeld, Richard Palma and Scott Yucht (collectively the "Defendants") in this action. I make this declaration in support of Defendants' motion to compel arbitration of all the claims in this action and to dismiss, or in the alternative, to stay this action in favor of arbitration.
- 2. Annexed hereto as Exhibit A is a true and correct copy of the Protective Order issued by Arbitrator Jeanne C. Miller, in the JAMS Arbitration captioned *Scott Sidell v. Structured Settlement Investments, L.P., et al.*, JAMS # 1425000992 (the "Arbitration"), on January 18, 2008.

3. Annexed hereto as Exhibit B is a true and correct copy of the employment agreement entered into by Scott Sidell and SSI dated September 6, 2006.

4. Annexed hereto as Exhibit C is a true and correct copy of a letter from Russell A. Green, Esq. of Hurwitz Sagarin Slossberg & Knuff, counsel for Sidell, to the Arbitrator, Jeanne

Miller, dated June 19, 2008.

5. Annexed hereto as Exhibit D is a true and correct copy of Order #8 issued by the

Arbitrator on July 7, 2008.

6. Annexed hereto as Exhibit E is a true and correct copy of the affidavit of Scott

Yucht dated November 14, 2007 (without exhibit) and produced in the Arbitration.

7. Annexed hereto as Exhibit F is a true and correct copy of Sidell's Demand for

JAMS Arbitration dated October 18, 2007 (without exhibits).

8. Annexed hereto as Exhibit G is a true and correct copy of the JAMS

Comprehensive Arbitration Rules and Procedures (effective March 26, 2007).

9. Annexed hereto as Exhibit H is a true and correct copy of the JAMS

Commencement of Arbitration Notice, addressed to all parties to the Arbitration, dated Nov. 1,

2007.

I declare under penalty of perjury under the laws of the United States that the foregoing is

true and correct. Executed this 23rd day of July 2008 in New York, New York.

/s/ John K. Crossman

John K. Crossman (ct25518)

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CERTIFICATE OF SERVICE

I hereby certify that, on July 23, 2008, a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access the foregoing through the Court's system.

/s/ John K. Crossman John K. Crossman (ct25518)