

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION**

Case No. 07-21403-CIV-COHN/SELTZER

**ANTONIO HERNANDEZ,**  
Individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

**IGE U.S. LLC,**  
a Delaware corporation,

Defendant.

\_\_\_\_\_ /

**DECLARATION OF SAMUEL S. HEYWOOD IN SUPPORT OF  
DEFENDANT’S OPPOSITION TO CLASS CERTIFICATION**

I, Samuel S. Heywood, hereby declare that:

1. I am over the age of 18 and am competent to provide this Declaration. I am a citizen of the United States and of the state of Florida.

2. I am an attorney of record for Defendant IGE U.S. LLC a/k/a Affinity Media Holdings, LLC (“IGE U.S.”), and duly authorized to practice law in the state of Florida.

3. On June 13, 2008, I entered the search term “world of warcraft gold” into the internet search engine www.google.com. Attached as “Exhibit A” is a true and correct printout of the first 30 results (out of an estimated 6,300,000) of that search.

4. Attached as additional exhibits to this Declaration are true and correct copies of printouts from the following web sites:

Exhibit B: Discussion forum on the question “who’s winning the gold farming war?” See <http://kotaku.com/381755/whos-winning-the-gold-farming-war> (last visited June 12, 2008).


Exhibit C: Discussion forum on a “gold seller and banning question.” *See* <http://www.worldofwar.net/forums/showthread.php?p=3647820&page=4> (last visited June 12, 2008).

Exhibit D: Discussion forum on “buying gold for World of Warcraft.” *See* <http://www.rage3d.com/board/showthread.php?t=33842027> (last visited June 12, 2008).

Exhibit E: RMT website. *See* <http://www.wowgoldvip.com> (last visited June 12, 2008).

Exhibit F: RMT website. *See* <http://www.wowmine.com/wowgoldus.php?gclid=CKyfsuKo2ZMCFRIhxgodtGN1TQ> (last visited June 12, 2008).

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

  
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Samuel S. Heywood, Esq.

DATED: June 13, 2008.