

EXHIBIT H

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 37.1, the undersigned counsel, James P. Ferguson, Jr., certifies that he has conferred with Plaintiff about the subject of this Motion, but he has been unable to resolve the underlying discovery dispute. Specifically, the undersigned counsel sent correspondence to Plaintiff on August 2, 2007, requesting that Plaintiff supplement his responses to Defendant's First Set of Interrogatories and Request for Production of Documents. After receiving no response to his August 2 correspondence, defense counsel sent another letter to Plaintiff on August 21, 2007, again requesting supplemental discovery responses.

In response, on August 27, 2007, Plaintiff contacted defense counsel to discuss various discovery issues. During that conversation, Plaintiff agreed to supplement his discovery responses and to produce the documents requested by Defendant. Although Plaintiff thereafter produced twenty-one (21) pages of random documents to Defendant, he still has not supplemented his discovery responses and has not produced the majority of the documents requested by Defendant. Accordingly, Defendant was forced to file the instant Motion.

/s/ James P. Ferguson, Jr.
James P. Ferguson, Jr.