

UNITED STATES DISTRICT COURT

Northern District of Indiana

South Bend Division

HEARTLAND RECREATIONAL)	
VEHICLES, LLC,)	
Plaintiff,)	
)	CASE NO.: <u>3:08-cv-490 TLS</u>
v.)	
)	
FOREST RIVER, INC.,)	JURY DEMAND
Defendant.)	

DECLARATION OF ANTHONY HOLLAND

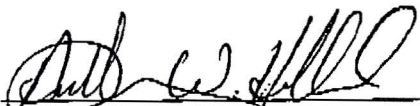
I, Anthony Holland, hereby declare under penalties of perjury under the laws of the State of Indiana, that:

1. I am an adult and am competent to the testify as to the matters herein based upon my personal knowledge and upon information and belief.
2. I am employed by E.T. & T. Enterprises in Elkhart, IN and was employed by its predecessor, E.T.& T. Frames since April 1991. E.T.&T. Frames was sold to Lippert Components approximately seven years ago.
3. The prints attached hereto are true and correct copies of RV frame prints that are part of the regular business records of E. T.&T. Enterprises and were part of the regular business records of E. T. & T. Frames. I created those frame prints that have my name, "A. Holland," indicated in whole or part in the "Drawn By" box in the lower right hand corner of each sheet. The frame prints which have S. Miller's name in whole or part in that Drawn By box were based upon my earlier drawings of that frame (I was Mr. Miller's supervisor at the time he made those drawings).

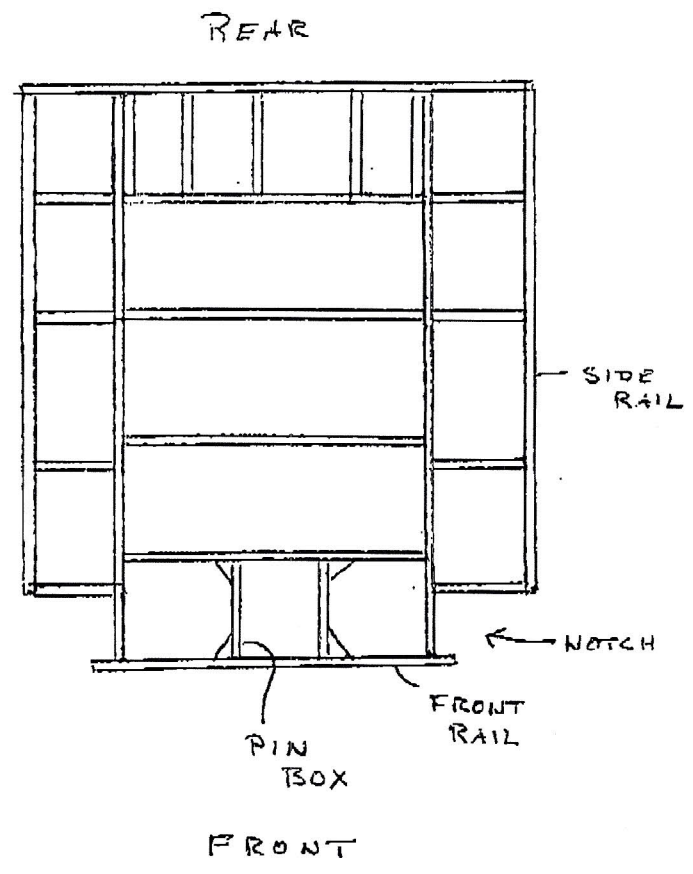
4. These prints show frames that E.T.&T Frames made and sold to its customers. The "Date Drawn" box shows the date that the drawing was most recently changed, often to indicate a new dimension or element added as a revision to an existing frame. The original date the drawing was made is not indicated on the attached prints. In some cases, the original print was created years previously, into the mid 1990s. The "Company Name" box indicates the name of the customer that particular frame was sold to on or about the time of the Date Drawn. The entry "Damon Park Model" means that the customer was Damon and the use of the frame was for one it is park model travel trailers. I do not know all the brand names of the Damon park model travel trailers which used these frames, but I do know that one of them was the Breckenridge, since E.T.&T. Frames made many and sold frames for Damon's Breckenridge park model travel trailers.

5. E.T.&T. Frames made and sold a full line of trailers, including cargo trailers, travel trailers, fifth-wheel trailers, and modular home trailers. In the mid 1990s, E.T.&T. Frames sold fifth-wheel frames to Damon and Dutchman. Attached as Sketch A, Sketch B, and Sketch C are partial hand sketch copies of the upper deck portion of fifth-wheel trailer frames which E.T.&T Frames sold to Damon between 1994-1996. In Sketch A, the front corner is left open to create a notch. In Sketch B the front corner was closed off by an angled length of metal bracing. Sketch C shows the upper deck portion of fifth-wheel trailer frames which E.T.&T. Frames sold to Damon for its Country Park models. In this sketch, the pin box was moved forward of the front rail of the frame. The pin box supports the trailer hitch device which connects the trailer to the towing vehicle.

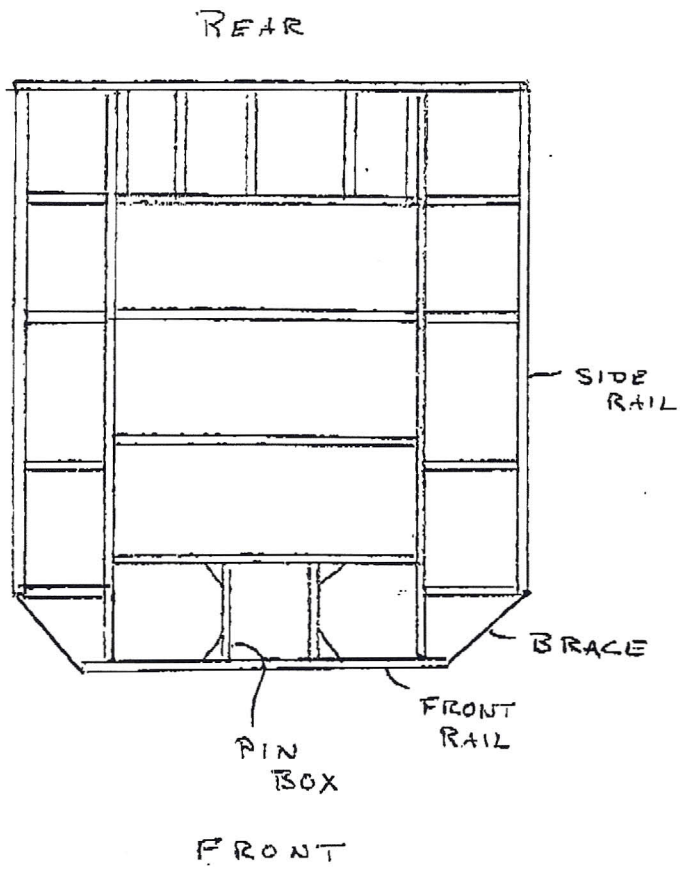
Dated: February 24, 2010


Anthony Holland

SKETCH A

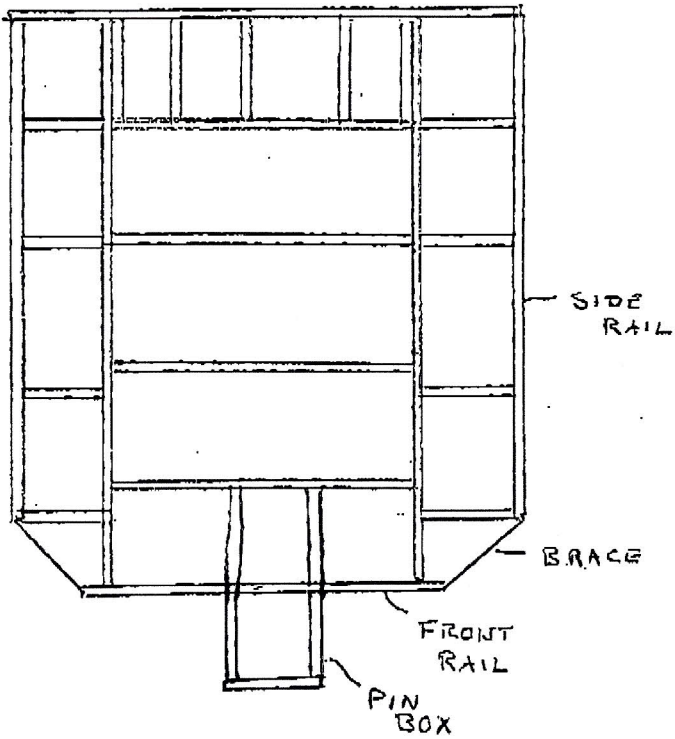


SKETCH B



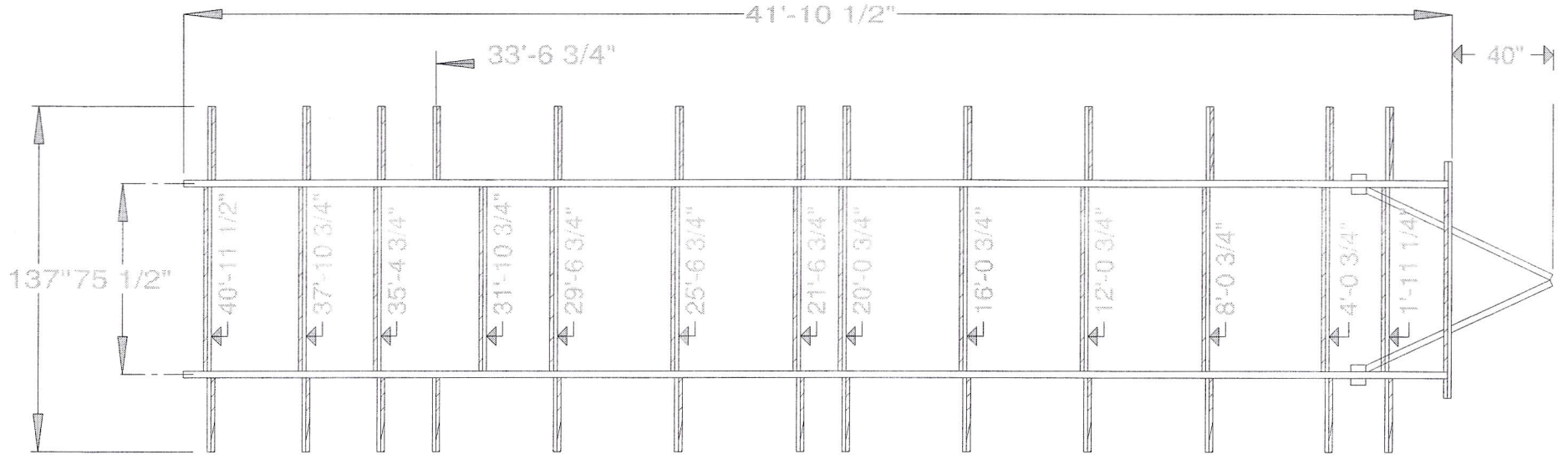
SKETCH C

REAR

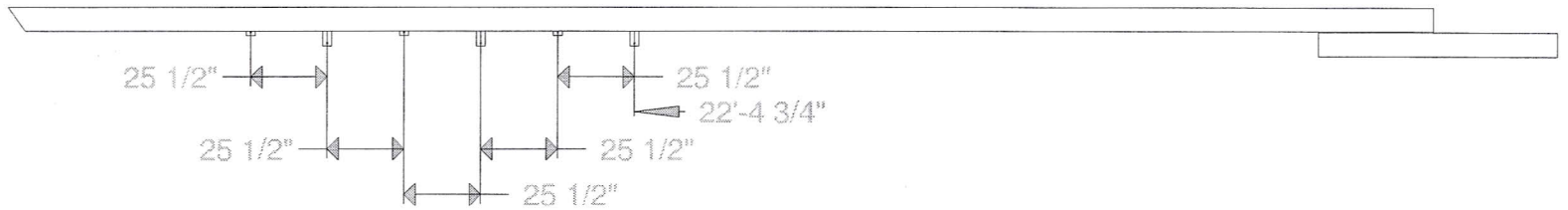


FRONT

NOTE: ALL OUTRIGGERS ARE TO HAVE 1/4" RISE.



NOTE: OUTRIGGERS ARE TO BE 11 GA. - "Z".



DRAWING NOTES

- 1. CAMBER: 1 3/4" POSITIVE
1/2" REVERSE

E.T. & T. FRAMES

28816 VENTURA DR., P.O. BOX 1
ELKHART, IN. 46515

SCALE : 1/4" = 1'-0"

DATE DRAWN 23 - 01

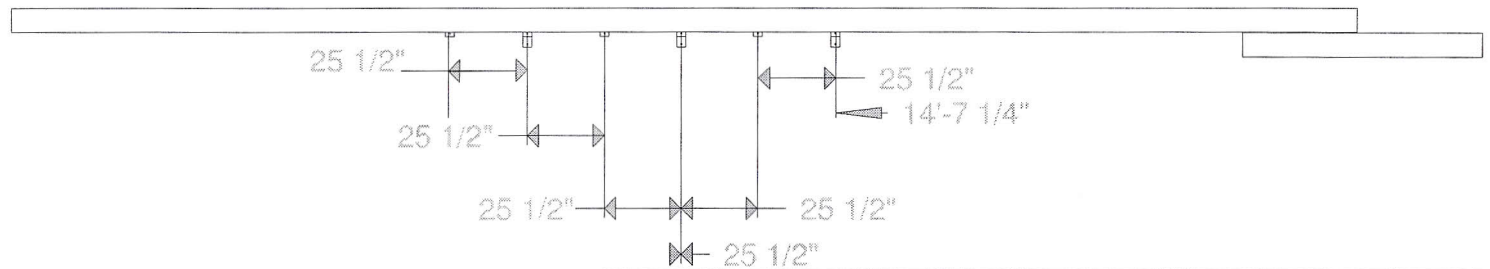
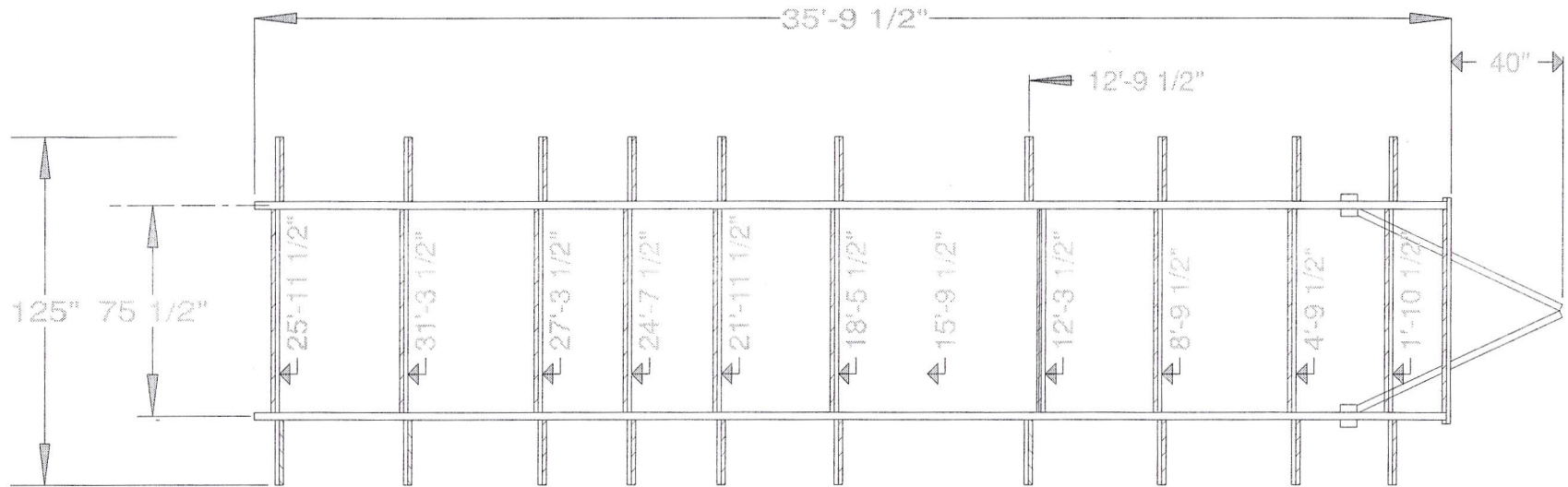
DRAWN BY S. Miller

COMPANY NAME:

DAMON PARK MODEL

FRAME SIZE: 1246 FDR-BH PARK MODEL
CUSTOMER NO. 11 - 5 - 0130

DRAWING NO.:
75232



DRAWING NOTES

- 1. CAMBER: 3/4" POSITIVE
0" REVERSE

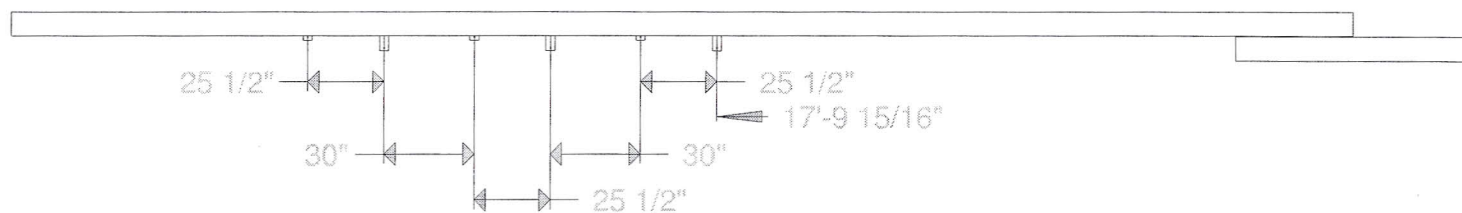
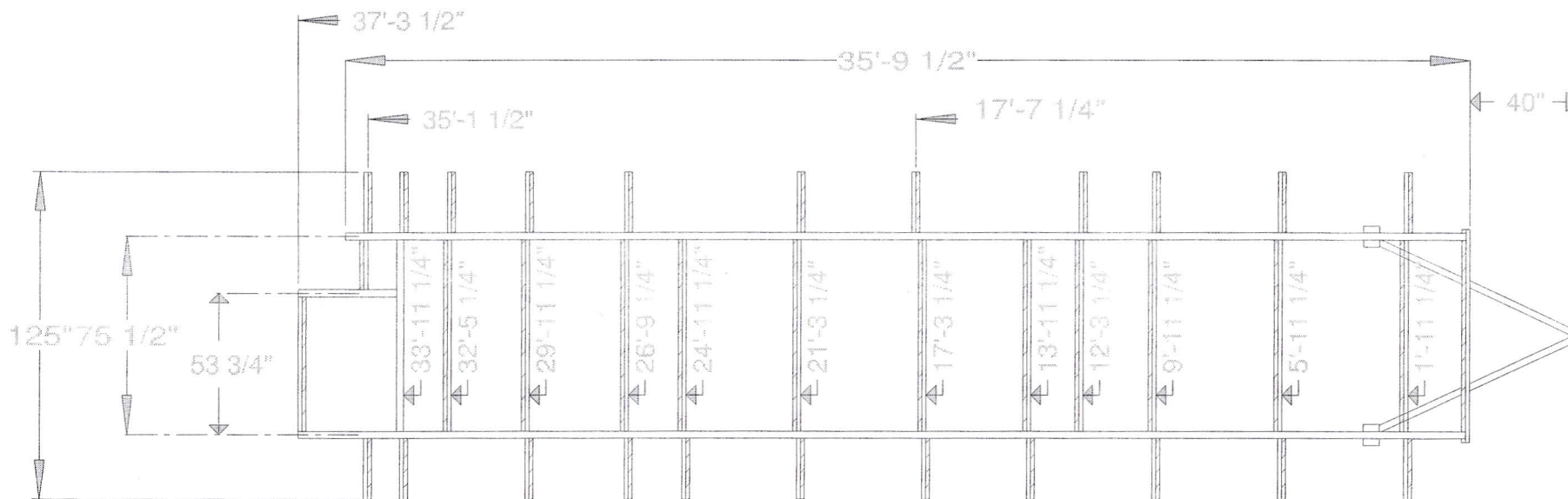
E.T. & T. FRAMES

28816 VENTURA DR. , P.O. BOX 1
ELKHART , IN. 46515

SCALE : 1/4"=1'-0" DATE DRAWN 22 - 01 DRAWN BY S. Miller

COMPANY NAME: DAMON PARK MODEL

FRAME SIZE: 1240 CBL PARK MODEL DRAWING NO.: 75207
CUSTOMER NO. 11 - 5 - 0092



DRAWING NOTES

- 1. CAMBER: 3/4" POSITIVE
0" REVERSE

E.T. & T. FRAMES

28816 VENTURA DR. , P.O. BOX 1
ELKHART , IN. 46515

SCALE : 1/4"=1'-0" DATE DRAWN 25 - 03 DRAWN BY **A. Holl**

COMPANY NAME: **DAMON PARK MODEL**

FRAME SIZE: 1240 FDB CSA PARK MODEL DRAWING NO.: **75264**
CUSTOMER NO. 11 - 5 - 0184