

Exh. Q

by entering the guests rooms, and then contacted hotel management about the incident and called to warn another hotel involved in the Forest River trade show. See also Trial Exhibit 42. Also, various Forest River employees were told stories and comments about the Hotel Action while the Forest River trade show was in progress. Further, as noted above, Mr. Brady testified that six to ten dealers were drawn from the Forest River event to Heartland as a result of the Hotel Action. That only one (as far as Heartland will admit) such dealer ended up buying products still means that the remaining five to nine dealers were at least also distracted from the Forest River trade show in progress

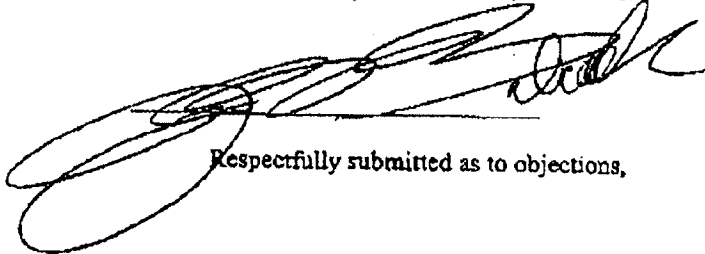
Interrogatory No. 11: Identify all information or documents that support Forest River's counterclaim against Heartland for Criminal Deception.

Response: See the responses to Interrogatory Nos. 8 - 10. Beyond that, no calculation has been made as yet for the special damages permitted by this claim, although it is inherent that such damages will exist in terms of the Forest River employee time involvement. Accordingly, further detail is objected to at this time.

I, Jeff Babcock, Vice President of Forest River, Inc., hereby declare that the facts set forth in the foregoing Responses are true and correct based upon my knowledge, information, and belief.

Dated: 8-16-09

Dated: August 10, 2009



Respectfully submitted as to objections,

Ryan M. Fountain (#8544-71)