

EXH. QQ

UNITED STATES DISTRICT COURT
Northern District of Indiana
South Bend Division

HEARTLAND RECREATIONAL)
VEHICLES, LLC,)
Plaintiff,)
)
)
v.)
)
FOREST RIVER, INC.,)
Defendant.)

CASE NO.: 3:08-cv-490 TLS-CAN

AFFIDAVIT OF BRAD CAMPKIN


I, Brad Campkin, upon my oath, declare and state as follows:

1. I am over eighteen years of age and have personal knowledge of the factual matters set forth in this affidavit. I am competent to testify on the matters stated herein.
2. I am the President of Campkin's RV Centre, a recreational vehicle dealership located in Myrtle Station, Ontario. Campkin's RV Centre has been a dealer of Heartland Recreational Vehicles, LLC's ("Heartland") products since December of 2006.
3. I attended the Forest River "Pick Your Partner" open house event that occurred in Elkhart, Indiana on October 22-23, 2008. I do not recall receiving any promotional materials from Heartland prior to attending the show.
4. Prior to arriving in Elkhart, Indiana for the Forest River open house event, I was already planning on visiting Heartland and other RV manufacturers while I was in town. I visited Heartland's facility while I was in town.
5. I believe that I had a packet of Heartland promotional materials delivered to me at my hotel room during the Forest River open house event, but I cannot remember specifics about the content of the materials.

6. The Heartland promotional materials I received at the hotel had no effect on my decision to visit Heartland while I was in town or on my eventual purchasing decisions or behavior. It was not like I was a new dealer to Heartland or was unfamiliar with their products or reputation. I placed orders from Heartland based on the products themselves, not a brochure.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 2, 2010.



Brad Campkin