

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ALBERT SNYDER,
Plaintiff

v.

FRED W. PHELPS, SR.,
SHIRLEY L. PHELPS ROPER,
REBEKAH A. PHELPS-DAVIS, and
WESTBORO BAPTIST CHURCH, INC.
Defendants

Civil Action No. 1:06-cv-1389-RDB
Judge Bennett

AFFIDAVIT OF PLAINTIFF, ALBERT SNYDER

Commonwealth of Pennsylvania
County of York

I, Albert Snyder, being duly sworn according to law, depose and state as follows:

1. I am the plaintiff in the above captioned action.
2. Several depositions on oral examination have been conducted for purposes of discovery.
3. The deposition of Fred W. Phelps, Sr., was taken in Kansas City on April 16, 2007. My deposition was taken by Defendants Fred Phelps and Westboro Baptist Church, Inc. on April 20, 2007, and a designated representative of the Church was also deposed on April 20.
4. I have not received the transcript for my deposition or the designated representative as of this date.
5. Other depositions are required for purposes of discovery.
6. According to this Court's previous Order, discovery ends on July 6, 2007.
7. Defendants Shirley Phelps-Roper and Rebekah Phelps-Davis have submitted their affidavits to the Court, and the depositions of these Defendants are necessary to clarify their statements.

8. According to an email from defendants Shirley Phelps-Roper and Rebekah Phelps-Davis, they are not providing dates for their deposition pending the outcome of this Court's ruling on their motion.

9. Assuming defendants Shirley Phelps-Roper and Rebekah Phelps-Davis stick to their story when being deposed concerning distance from my son's funeral, it will be necessary to depose or obtain affidavits from police officers or members of St. John's Catholic Church.

10. Defendants Fred Phelps and Church have identified several potential theological experts and several potential experts in endocrinology. If in fact, any of these doctors agree to testify as expert witnesses or provide an expert report on Defendants' behalf, it will be necessary for my counsel to depose them in advance of trial.

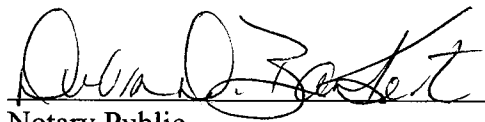
11. Defendants Phelps and WBC have scheduled my medical examination for June 18, 2007. I believe they need further discovery or they would not have scheduled my medical examination.

12. I have relied upon my counsel to draft this affidavit.

Further, deponent sayeth not.


Albert Snyder

Sworn and subscribed to
before me this 10th day
of May, 2007.


Notary Public

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