

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

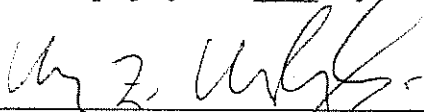
CHRISTINE VARAD,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 06 CA 11370 MLW
	)	
REED ELSEVIER INCORPORATED,	)	
d/b/a/ Lexis Nexis Corporation,	)	
Lexis Nexis Accurint,	)	
	)	
Defendant.	)	

**AFFIDAVIT OF HENRY Z. HORBACZEWSKI**

I, Henry Z. Horbaczewski, hereby depose and state as follows:

1. I am Senior Vice President and General Counsel of Reed Elsevier Inc., (“Reed”), and make this affidavit based on my personal knowledge.
2. Reed is a separate legal entity from Seisint, Inc.
3. Reed has never received from plaintiff Christine Varad a letter demanding relief pursuant to Mass. Gen. Laws c. 93A or any other correspondence concerning the allegations in this litigation, prior to the institution of this lawsuit.

Signed under the pains and penalties of perjury, this 8 day of December, 2006.

  
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 Henry Z. Horbaczewski, Senior Vice President  
 and General Counsel, Reed

*Carol Mary Onorato*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of December, 2006, I caused a copy of the foregoing to be served on the following by regular mail:

Christine M. Varad  
P.O. Box 583  
Milton, MA 02186

/s/ Kristin M. Cataldo  
Kristin M. Cataldo