

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JAYME GORDON,

Plaintiff,

v.

DREAMWORKS ANIMATION SKG, INC.,
DREAMWORKS ANIMATION LLC, and
PARAMOUNT PICTURES, CORP.,

Defendants.

C.A. No. 1:11-cv-10255-JLT

DECLARATION

I, Joe Martinez, declare and state as follows:

1. I make this declaration of my own knowledge.
2. I am a member of the New England Herpetological Society, which is a group of reptile and amphibian enthusiasts. I am acquainted with Jayme Gordon through this Society.
3. On October 23, 2011, I ran into Jayme Gordon at the Massachusetts Reptile Expo at the Holiday Inn hotel in Rockland, MA. Before this date, I had not seen Jayme Gordon for several years. I used to see him frequently, about 15 – 20 years ago, when Jayme Gordon was a board member of the Society.
4. On October 13, 2011, I received an email from Rose Ryan from Marcum LLP titled “Background History.” Ms. Ryan’s e-mail noted that she had been referred to me by

Kurt Schatzl (who is the president of the New England Herpetological Society) and asked me to call her.

5. During this same time frame, I was made aware by Mr. Schatzl, and another board member of the Society, that a person was seeking references on Jayme Gordon's behalf. I called Rose thinking that I was doing Jayme a favor. She asked me questions about Jayme Gordon. Based on her questions, I was under the impression that Jayme Gordon had applied for a new job and the woman was calling seeking references for his prospective employer.
6. At the Expo on October 23, 2011, I informed Jayme Gordon about this telephone call and e-mail, and I forwarded to Jayme the e-mail, which is attached to this declaration as Exhibit A.
7. I declare under penalty of perjury that the foregoing is true and correct.

^{November}
Dated: October 3, 2011


