

# Affidavit of Valiena Allison

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

EXPERI-METAL INC.,  
a Michigan corporation,

Plaintiff,

Case No. 2:09-cv-14890

vs.

Hon. Patrick J. Duggan

COMERICA BANK,

Defendant.

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**AFFIDAVIT OF VALIENA A. ALLISON**

STATE OF MICHIGAN    )  
                                  ) SS.  
COUNTY OF OAKLAND    )

Valiena A. Allison, being first duly sworn, deposes and states as follows:

1. I make this Affidavit based on my personal knowledge of the facts set forth in this Affidavit and am competent to testify to the truth of said facts if called upon to do so, and as to those facts which are based upon information and belief, I believe them to be true.

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2. I am President and CEO of Experi-Metal Inc., the Plaintiff in this action.

3. I have reviewed the document which has been attached as Exhibit 13 to Comerica Bank's Supplemental Filing in Support of Motion for Summary Judgment entitled "Treasury Management Implementation Worksheet."

4. The signatures on page 1 of Exhibit 13 are my signature and the signature of Keith Maslowski. My signature also appears on page 3 of the document. The rest of the writing on the document is neither mine nor Keith Maslowski's.


5. At the time that the document was prepared by Comerica and presented to me for signature, I was advised and understood that the document authorized me or Keith Maslowski to initiate wire transfers on behalf of Experi-Metal by telephone to Comerica. The document does not authorize Keith Maslowski to initiate any wire transfers electronically or through electronic banking which is involved in this case.

6. Experi-Metal never authorized Keith Maslowski to initiate wire transfers electronically.

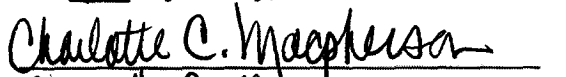
7. Under Comerica's old Net Vision Wire Transfer Service, the only individuals who were authorized to initiate wire transfers as of December 1, 2007, were me and Gerald King as shown on the attached Exhibit 8. As of December 1, 2007, Mr. Maslowski was not authorized to initiate any wire transfers even under the old Comerica Net Vision Wire Transfer Service.

8. When Comerica instituted its new wire transfer service through TM Connect Web in May, 2008, with its new security procedures and systems, Experi-Metal never authorized Keith Maslowski to initiate wire transfers on behalf of Experi-Metal with respect to the account from which the wire transfers were made in this case.

FURTHER AFFIANT SAYETH NOT.

  
Valiena A. Allison

Subscribed and sworn to before me  
this 7th day of July, 2010.

  
Charlotte C. Macpherson  
Notary Public, Oakland County, MI  
My Commission Expires: 12.25.2012  
Acting in Oakland County, MI