

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

AMERICAN NATIONAL PROPERTY AND CASUALTY COMPANY,)	
)	
<i>Plaintiff, Counter-Defendant,</i>)	
)	
v.)	CIVIL ACTION
)	NO. 3:11-CV-219
CAROL ANN STUTTE; LAURA JEAN STUTTE,)	
)	
<i>Defendants, Counter-Plaintiffs,</i>)	
)	
and)	
)	
CHASE HOME FINANCE, LLC,)	
)	
<i>Defendant.</i>)	
)	

AFFIDAVIT OF LORA LEE BLACK

1. My name is Lora Lee Black. I am above the age of eighteen (18) and am competent to make this Affidavit. I will testify as to these facts in a court of law if called to do so.

2. I am a resident of Vonore, Tennessee, and am a neighbor and friend of Carol Ann and Laura Stutte, the defendants in this litigation. On the afternoon of September 4, 2010, I traveled with the Stuttes from Vonore to Nashville, Tennessee, for a short vacation, along with the Stuttes' adult daughter, Kimberly Holloway. The four of us arrived in Nashville in the early evening, when we checked into our hotel, the Holiday Inn Express. After checking in, we drove and parked in downtown Nashville and proceeded to the Wildhorse Saloon, a popular restaurant and club in that city. Around 8:11 p.m. Central time, I received a call from my daughter, Jade,

informing me that the Stuttes' house was on fire. The four of us stayed at the Wildhorse Saloon, crying and attempting to console the Stutte family, before returning to our hotel room. Carol Ann Stutte left shortly after we returned to the hotel, to travel back to the Stuttes' home in Vonore and check on the safety of the Stuttes' dogs. Laura, Kimberly and I stayed overnight in our hotel room in Nashville, rented a car in the afternoon of September 5, 2010, and left Nashville in the late afternoon of that day to return to Vonore.

3. After the fire, I learned – to my shock and surprise – that the Stuttes were being investigated by ANPAC for their potential involvement of the fire. I wanted to assist the Stuttes in showing ANPAC the truth – that the Stuttes could not have had a role in the fire because they were with me in Nashville at the time of the fire. Toward that end, I gathered materials documenting our trip to Nashville. I assembled in a blue folder: (1) receipts from the Nashville trip, (2) my cell phone records covering the period of the trip, (3) my home phone records covering the period of the trip, and (4) my bank statement showing the charge to my debit card for the food and drinks at the Wildhorse Saloon.

4. I also had downloaded to my home computer pictures taken of the Nashville trip with my digital camera. I or other members in our group took approximately 45 pictures covering the period from when we were packing up the car to leave from the Stuttes' house in Vonore to Nashville on September 4, 2010, to near the time I received the call from my daughter, Jade, that the Stuttes' house was on fire.

5. ANPAC's private investigator, whose name I believe is Gary Noland, arrived at my home one day unannounced. I invited him in, as I was eager to assist the Stuttes and ANPAC in its investigation. My interview with Mr. Noland lasted roughly 45 minutes, though during some of that time, Mr. Noland was interviewing my daughter, Jade, and her boyfriend,

who were both in Vonore and had seen the Stuttes' house engulfed in flames. Jade had also seen us pack up the car to leave for Nashville, and took several pictures of me, Carol Ann, Laura and Kimberly in front of the back of the Stuttes' Honda Element packed high with all of our luggage.

6. It became apparent to me during Mr. Noland's visit that he had no little or no interest in any information that would establish that the Stuttes had nothing to do with the fire. Three things in particular struck me about Mr. Noland's questioning of me.

7. First, I offered Mr. Noland multiple opportunities to review the documents I had collected in my blue folder that I described above, such as my cell phone records around the time of the fire. Mr. Noland showed barely any interest in those documents, but he ultimately paged through the documents in the blue folder for only a minute or so. That surely was not enough time to review the materials I had collected. My cell phone records, for example, were several pages long and contained the call records for four separate phones under my family's cell phone plan. I offered to make Mr. Noland copies of any documents in the blue folder he wanted, as I had a combination printer/copier in my home office. Mr. Noland declined and left without taking copies of any of the documents I had collected. This surprised me, and I cannot understand why Mr. Noland refused to accept my offer to make him copies of documents that were pertinent to his investigation and which he could not have possibly seen before.

8. Second, Mr. Noland had little or no interest in hearing me recount the details of my trip with the Stuttes to Nashville or provide him with positive information about the Stuttes. Instead, he was sharply focused on getting "dirt" on the Stuttes, and getting my reaction to gossip and rumors about the Stuttes he told me that he had heard during the course of his investigation. For example, Mr. Noland wanted to know about gossip that the Stuttes had moved a large amount of furniture out of their house before the fire. I told Mr. Noland that was false; the

Stuttes had only moved out a few bookcases in their attempt to “de-clutter” and “de-personalize” their house to make it more attractive to potential home buyers – what realtors refer to as “staging” a house for sale. In fact, I told Mr. Noland that I was inside the Stuttes’ house on September 4 before we left for Nashville. My daughter, Jade, also saw the inside of the Stuttes’ house the afternoon of September 4. The Stuttes were proud of the work they had done on their house and how they had gotten it ready to be put on the market, and gave me and my daughter a tour of the house. My daughter and I both explained to Mr. Noland that we noticed no furniture missing except for the bookcases.

9. Mr. Noland also questioned my daughter and me about the Stuttes removing appliances from their home before the fire. My daughter and I explained to him that we saw the appliances when we took the tour of the Stuttes house on the day of our trip to Nashville. We explained that we certainly would have noticed missing appliances when we toured the Stuttes’ home. I also explained to him that if you go to the burn site, you can look in the crater in the ground and see the burnt appliances.

10. It became apparent to me as the interview progressed that it was Mr. Noland’s theory that the Stuttes committed arson and that he believed I was not being truthful to him. He seemed to have his mind made up and nothing my daughter or I could say or provide appeared to change his view. Other than the mere fact that I was friends with the Stuttes, I do not believe Mr. Noland should have had any reason to doubt what I and my daughter were telling him.

11. Finally, as I mentioned above, I or members of our group took approximately 45 pictures of our Nashville trip on my digital camera. These pictures were downloaded onto my computer in my home office, and I offered Mr. Noland the opportunity to review them. I noted

to Mr. Noland that the pictures would each have date-stamps associated with them, though the date-stamps would be off because the camera's time had been set incorrectly (it was set for a.m. time when it should have shown p.m. (or vice versa), and there was also a one-hour time difference between Vonore and Nashville). Mr. Noland declined my offer and never looked at any of the time-stamped pictures of the Nashville trip taken with my digital camera.

12. Mr. Noland was the only ANPAC representative to ever question or contact me. I would have been happy to provide ANPAC or its representatives copies of the documents I collected and pictures taken with my camera, or provide any other information relevant to its investigation.

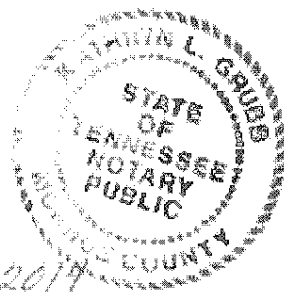
13. In my view, Mr. Noland saw his job as finding evidence to support ANPAC's apparent theory that the Stuttes had lied about going to Nashville and having no involvement in the fire. He ignored and did not want to see any evidence that contradicted that theory.

FURTHER AFFIANT SAYETH NOT

Lora Lee Black
Lora Lee Black

Sworn to and subscribed before me
this the 14 day of February 2012

Kathryn L. Grubb
Notary Public



My commission expires: 10-14-2014