

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
IN NASHVILLE**

TAYLOR SWIFT,

Plaintiff

v.

MALCOLM MATTHEWS, et al.,

Defendants

Civil Action No. 3:09-0442

Judge Wiseman

Magistrate Judge Griffin

FILED UNDER SEAL

DECLARATION OF FRANCISCO JAVIER DOMINGUEZ

I, FRANCISCO JAVIER DOMINGUEZ, declare that:

1. I am the Merchandise Manager for Plaintiff, Taylor Swift (“Plaintiff”). I make this Declaration pursuant to Rule 43(c) of the Federal Rules of Civil Procedure and 15 U.S.C. § 1116(d), and as my testimony in support of Plaintiff’s Motion to Extend Time Period and Supplement Locations Identified in Preliminary Injunction and Order of Seizure of Counterfeit Goods (“Order”; Document Entry No. 33). All statements contained in this Declaration are based upon my personal knowledge, and I am authorized and competent to testify as to the truth of these statements.

2. This Declaration is to supplement the declarations that I made previously in connection with the issuance of the Order. Since the entry of the Order, I have continued to travel with Plaintiff to her live performances, as part of Plaintiff’s 2009 “Fearless” Tour, in accordance with the schedule set forth on Exhibit B to the Order.

3. At these concerts, I continued to carry out my responsibilities for anti-counterfeiting enforcement, working with other members of Plaintiff's merchandise enforcement team and local law enforcement officials.

4. As a result of these efforts, I have observed numerous individuals engaged in distribution, sale and offering for sale of merchandise bearing counterfeit trademarks TAYLOR SWIFT, in word and/or stylized form, and FEARLESS, and/or Plaintiff's name and likeness ("Counterfeit Goods") near the location of Plaintiff's concerts in New York, New York, Duluth, Georgia, Greenville, South Carolina, Charlotte, North Carolina, Dallas, Texas, and Little Rock, Arkansas, on August 27, 2009, and September 3, 4, 5, 25 and 26, 2009, respectively ("Counterfeiters").

5. Local law enforcement officials executed the Order, and I have served the Summons and the First Amended Complaint, on the Counterfeiters. Several of these individuals have been detained by the law enforcement officials. The officials have seized approximately 400 items of Counterfeit Goods, in the nature of tee-shirts, from these individuals. Further, pursuant to this Court's Order, law enforcement officials were able to receive identifying information from the Counterfeiters, including their names and addresses.

6. The seized Counterfeit Goods have been properly identified and secured, and are being kept in the custody of the Court, in accordance with this Court's Orders.

7. I and other members of Plaintiff's merchandise enforcement team have inspected the seized Counterfeit Goods. These Counterfeit Goods are of the same general nature and type as genuine and authorized Plaintiff's merchandise and display Plaintiff's image, photograph and likeness, as well as Plaintiff's trademarks TAYLOR SWIFT, in word and stylized forms. However, the design and materials of these Counterfeit Goods are of significantly inferior

quality, and similar to the design, materials and quality of Counterfeit Goods previously seized pursuant to the Order.

8. Without the Order, Plaintiff would have suffered damage from counterfeiting activities at Plaintiff's concerts, and would be unable to effectively enforce her trademark and personal rights. Faced with these counterfeiting activities, Plaintiff's merchandise enforcement team was able to receive cooperation from local law enforcement officials specifically with respect to the enforcement of this Court's Order. In the absence of this Order, many law enforcement officers would not extend any cooperation to Plaintiff for her anti-counterfeiting enforcement efforts, and Plaintiff would be unable to stop the sale of Counterfeit Goods or to receive identification of the Counterfeiters.

9. Based on my experience with the counterfeiting activities during the Plaintiff's Fearless Tour to-date, I expect that such activities will continue through the end of the Plaintiff's Tour.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 30, 2009



FRANCISCO JAVIER DOMINGUEZ