

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

TAYLOR SWIFT,

Plaintiff

v.

MALCOLM MATTHEWS; RENEE SUSAN MITCHELL; LOUIS MOORE; MARTIN D. QUATTLEBAUM; MARSHA DYONNE TYLER; MELLISSA LIEBERMAN; EDWARD FRIEDMAN; KENNETH JOHNSON; ROBERT VINCENT ESTRONZA; TAIEF HASSON WALLACE; VANCE HILL; VERNANDO SMITH; ANDRE ANTHONY JONES; FRANK PARSONS; CARLO PONTI SMITH; WILBERT G. PRINCE; MERVIN A. BROWN; ERIC LOPP; JEFFREY L. WATKINS; DENNIS LANE WEAVER; KILO JAMES; TYRONE "PIGGY" SQUIRES; BURRELL DICKERSON; and BRAULIO RIVIERA,

Defendants

Civil Action No. 3:09-CV-0442

Judge Wiseman

Magistrate Judge Griffin

**FILED UNDER SEAL**

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**DECLARATION OF NATALYA L. ROSE IN SUPPORT OF  
PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT UNDER FED. R. CIV. P. 55(A)**

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I, Natalya L. Rose, declare that:

1. I am above the age of majority, of sound mind, and make this declaration based upon my own personal knowledge or, if so identified, upon my own information and belief.

2. I am a citizen and resident of Davidson County, Tennessee, and am an attorney admitted to practice law in the State of Tennessee and before this Court. I have entered an appearance before this Court on behalf of, and am an attorney of record for, Plaintiff Taylor Swift (“Plaintiff”).

3. On May 18, 2009, Plaintiff filed her Verified Complaint, naming Malcolm Matthews, Renee Susan Mitchell, Louis Moore, Martin D. Quattlebaum, Marsha Dyonne, Various John Does, Various Jane Does and Various XYZ Corporations as defendants (“Complaint”). Document 1.

4. On May 27, 2009, service of the Complaint, together with a properly issued Summons, was effected on Martin D. Quattlebaum (“Quattlebaum”) by hand delivery at what is believed to be Defendant Quattlebaum’s place of residence, namely, 8556 Kendrick Road, Jonesboro, Georgia 30238. Proof of such service was filed with this Court on June 3, 2009. Document 23.

5. On June 10, 2009, Plaintiff filed her First Amended Verified Complaint, naming Brendan Schiff, Melissa Lieberman and Edward Friedman as additional defendants (“First Amended Complaint”). Document 26.

6. On June 24, 2009, service of the First Amended Complaint, together with a properly issued Summons, was effected on Robert Vincent Estronza (“Estronza”) by U.S. Certified Mail delivery at what is believed to be Defendant Estronza’s place of residence, namely, 1281 Brockett Road, Clarkston, GA 30021. Proof of such service was filed with this Court on July 13, 2009. Document 38.

7. On September 3, 2009, service of the Complaint, together with a properly issued Summons, was effected on Vance Hill (“Hill”) by hand delivery in the vicinity of

Gwinnett Arena, 6500 Sugarloaf Parkway, Duluth, Georgia 30097. Proof of such service was filed with this Court on October 2, 2009. Document 69.

8. On September 3, 2009, service of the Complaint, together with a properly issued Summons, was effected on Vernando Smith (“Vernando Smith”) by hand delivery in the vicinity of Gwinnett Arena, 6500 Sugarloaf Parkway, Duluth, Georgia 30097. Proof of such service was filed with this Court on October 2, 2009. Document 71.

9. On September 4, 2009, service of the Complaint, together with a properly issued Summons, was effected on Andre Anthony Jones (“Jones”) by hand delivery in the vicinity of Bi-Lo Center, 650 N. Academy Street, Greenville, South Carolina 29601. Proof of such service was filed with this Court on October 2, 2009. Document 74.

10. On September 4, 2009, service of the Complaint, together with a properly issued Summons, was effected on Frank Parsons (“Parsons”) by hand delivery in the vicinity of Bi-Lo Center, 650 N. Academy Street, Greenville, South Carolina 29601. Proof of such service was filed with this Court on October 7, 2009. Document 75.

11. On September 4, 2009, service of the Complaint, together with a properly issued Summons, was effected on Carlo Ponti Smith (“Carlo Ponti Smith”) by hand delivery in the vicinity of Bi-Lo Center, 650 N. Academy Street, Greenville, South Carolina 29601. Proof of such service was filed with this Court on October 2, 2009. Document 76.

12. On September 4, 2009, service of the Complaint, together with a properly issued Summons, was effected on Wilbert G. Prince (“Prince”) by hand delivery in the vicinity of Bi-Lo Center, 650 N. Academy Street, Greenville, South Carolina 29601. Proof of such service was filed with this Court on October 2, 2009. Document 77.

13. On September 5, 2009, service of the Complaint, together with a properly issued Summons, was effected on Mervin A. Brown (“Brown”) by hand delivery in the vicinity of Time Warner Cable Arena, Charlotte, North Carolina 28202. Proof of such service was filed with this Court on October 2, 2009. Document 68.

14. On September 5, 2009, service of the Complaint, together with a properly issued Summons, was effected on Eric Lopp (“Lopp”) by hand delivery in the vicinity of Time Warner Cable Arena, Charlotte, North Carolina 28202. Proof of such service was filed with this Court on October 2, 2009. Document 70.

15. On September 5, 2009, service of the Complaint, together with a properly issued Summons, was effected on Jeffrey L. Watkins (“Watkins”) by hand delivery in the vicinity of Time Warner Cable Arena, Charlotte, North Carolina 28202. Proof of such service was filed with this Court on October 2, 2009. Document 72.

16. On April 30, 2010, service of the Complaint, together with a properly issued Summons, was effected on Dennis Lance Weaver (“Weaver”) by hand delivery in the vicinity of Colonial Life Arena, Columbia, South Carolina. Proof of such service was filed with this Court on July 8, 2010. Document 85.

17. On May 12, 2010, service of the Complaint, together with a properly issued Summons, was effected on Kilo James (“James”) by hand delivery in the vicinity of Prudential Center, Newark, New Jersey. Proof of such service was filed with this Court on July 8, 2010. Document 82.

18. On May 12, 2010, service of the Complaint, together with a properly issued Summons, was effected on Tyrone “Piggy” Squires (“Squires”) by hand delivery at in the

vicinity of Prudential Center, Newark, New Jersey. Proof of such service was filed with this Court on July 8, 2010. Document 84.

19. On May 14, 2010, service of the Complaint, together with a properly issued Summons, was effected on Burrell Dickerson (“Dickerson”) by hand delivery in the vicinity of Nassau Veterans Memorial Coliseum, Uniondale, New York 11553. Proof of such service was filed with this Court on July 8, 2010. Document 81.

20. On May 14, 2010, service of the Complaint, together with a properly issued Summons, was effected on Braulio Riviera (“Riviera”) by hand delivery in the vicinity of Nassau Veterans Memorial Coliseum, Uniondale, New York 11553. Proof of such service was filed with this Court on July 8, 2010. Document 83.

21. Defendants Quattlebaum, Estronza, Hill, Vernando Smith, Jones, Parsons, Prince, Carlo Ponti Smith, Brown, Lopp, Watkins, Weaver, James, Squires, Dickerson and Riviera have not filed either an answer, a request for extension of time to answer, or some other pleading responsive to the Complaint or the First Amended Verified Complaint, due to be filed with the Court on or before June 3, 2010.

22. Counsel for Plaintiff has no reason to believe that Defendants are in military service. Service of process was effected on Defendants at what is believed to be Defendants’ places of residence and/or at various entertainment and sporting venues. Further, Military Status Reports Pursuant to the Service Members Civil Relief Act provided by Department of Defense Manpower Data Center (“DMDC”) on August 16, 2010 state that “the DMDC does not possess any information indicating the individual status” of Defendants Quattlebaum, Estronza, Hill, Vernando Smith, Jones, Parsons, Prince, Carlo Ponti Smith, Brown, Lopp, Watkins, Weaver, James, Squires, Dickerson and Riviera, and do not indicate that

Defendants are currently on active duty. Electronic copies of the DMDC reports are attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on August 17, 2010.

  
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Natalya L. Rose (No. 021701)  
**MILOM JOYCE HORSNELL CROW PLC**  
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Nashville, Tennessee 37203  
Telephone: (615) 255-6161  
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## CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing Declaration of Natalya L. Rose in Support of Plaintiff's Motion for Entry of Default Under Fed. R. Civ. P. 55(a) is being accomplished through delivery by U.S. First Class Mail, postage pre-paid, this 17<sup>th</sup> day of August, 2010, upon the following:

Martin D. Quattlebaum  
8556 Kendrick Road  
Jonesboro, Georgia 30126

Robert Vincent Estronza  
1281 Brockett Road  
Clarkston, Georgia 30021

Vance Hill  
6169 Charring Cross Court  
Lithonia, Georgia 30058

Vernando Smith  
1119 Redantrian Court  
Stone Mountain, GA 30088

Andre Anthony Jones  
8330 Bluff Road  
Columbia, South Carolina 29214

Frank Parsons  
1622 Curry Street  
Columbia, South Carolina 29204

Wilbert G. Prince  
1837 Barbara Drive 11A  
Columbia, South Carolina 29223

Carlo Ponti Smith  
2225 Hwy 1 South, Apt. 905  
Elgin, South Carolina 29073

Mervin A. Brown  
1627 Carnegie Street, Apt. B  
Columbia, South Carolina 29204-1472

Eric Lopp  
153-20 123 Avenue  
Jamaica, New York 11434

Jeffrey L. Watkins  
667 Westwood Drive  
Lexington, South Carolina 29073-8038

Dennis Lance Weaver  
3911 St. Andrews, Apt. 302  
Columbia, South Carolina 29201

/s/ Natalya L. Rose  
Natalya L. Rose