

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

Cong Pham  
*Plaintiff,*

§  
§  
§  
§  
§  
§  
§  
§

v.

F/V ST JOSEPH VII,  
official no. 1139728 and any  
freights, apparel, appurtenances, tackle, etc.  
*in rem*

Civil Action No.  
In Admiralty Rule 9(h)

**VERIFICATION AND AFFIDAVIT PURSUANT TO ADMIRALTY RULE C**

My name is Paxton N. Crew, I am an attorney of record for Cong Pham, and I am capable of making this statement. I have read the above and foregoing Complaint and the allegations thereof are true and correct based upon the information, knowledge and belief, based on my personal knowledge and on information and documents furnished by or on behalf of plaintiff. Additionally, attached to the complaint are true and correct copies of the correspondence exchanged between myself and Mr. Halvorsen Hirscheffeld which have been marked as Exhibits "A" and "B" to the Complaint for Arrest and Request for Security.

Sworn to under penalty of perjury, 28 U.S.C. § 1746 this 26<sup>th</sup> of December 2011.

12-26-2011  
Date

/s/ Paxton N. Crew  
Paxton N. Crew