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ATTORNEYS FOR INTERVENORS

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

RICHARD FRESCO et. al.,
Plaintiffs,

v.

AUTOMOTIVE DIRECTIONS, INC., a Wisconsin
Corporation; et.al.
Defendants.

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CASE NO. 03-cv-61063-JEM

AFFIDAVIT OF THOMAS M. COREA

STATE OF TEXAS §
§
COUNTY OF DALLAS §

Before me, the undersigned notary public, personally appeared Thomas Corea, and stated on his oath as follows:

1. My name is Thomas M. Corea. I am over the age of eighteen years old and have never been convicted of a felony. I am of sound mind and capable in all respects of making this

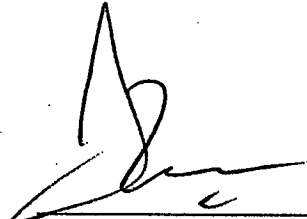
affidavit. The statements contained herein are true and correct, and they are based on my personal knowledge.

2. I am the Managing Partner of The Corea Firm, PLLC, a law firm based in Dallas, Texas.
3. My firm has been investigating possible violations of the Drivers' Privacy Protection Act in Texas since early 2006.
4. In the course of that investigation, The Corea Firm had our investigator contact the Texas Department of Public Safety ("the Department") to obtain records for individuals and companies who purchased drivers' license records from the Department.
5. Specifically, under my supervision, our investigator requested the names of companies who purchased the Department's entire drivers' license records database.
6. Our investigator was provided with a list of names of the companies who obtained the Department's entire file and who were thus considered by the Department to be "bulk" requestors. A true and correct copy of the list of "bulk" requestors obtained from the Department is attached hereto as Exhibit 1.
7. Our investigator subsequently obtained copies of contracts entered between the individuals and companies listed in Exhibit 1 and the Department.
8. A true and correct copy of the contract between ChoicePoint Services, Inc. and the Texas Department of Public Safety is attached hereto as Exhibit 2.
9. A true and correct copy of the contract between LexisNexis and the Texas Department of Public Safety is attached hereto as Exhibit 3.
10. A true and correct copy of the contract between Seisint, Inc. and the Texas Department of Public Safety is attached hereto as Exhibit 4.
11. A true and correct copy of the contract between Acxiom and the Texas Department of

Public Safety is attached hereto as Exhibit 5.

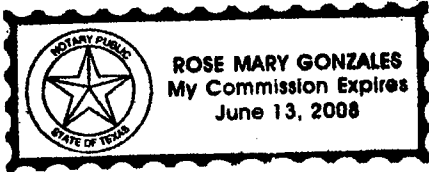
12. On January 4, 2007, our law firm filed a lawsuit, on behalf of our clients, in the United States District Court for the Eastern District of Texas against the above listed entities for violation of the Drivers' Privacy Protection Act. A true and correct copy of the Complaint filed in that action is attached hereto as Exhibit 6.

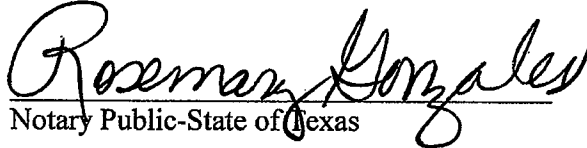
FURTHER AFFIANT SAYETH NAUGHT.



Thomas M. Corea

SUBSCRIBED AND SWORN TO BEFORE ME the undersigned notary public on this the _____ day of _____, 2007.





Notary Public-State of Texas