

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

DELIVERANCE POKER, LLC,

Plaintiff,

vs.

MICHAEL MIZRACHI and TILTWARE,
LLC,

Defendants.

CIVIL ACTION NO. 1:10-CV-00664-JRN

**DECLARATION OF JORDAN D. GROTZINGER IN SUPPORT OF REPLY RE
EXPEDITED MOTION TO DISMISS AND OPPOSITION TO PLAINTIFF'S MOTION
TO DISMISS NON-DIVERSE PARTY**

I, Jordan D. Grotzinger, declare:

1. I am a shareholder in the law firm of Greenberg Traurig, LLP, counsel for Defendant Tiltware, LLC ("Tiltware") in this action. As such, I have personal knowledge of the matters stated herein, and could and would competently testify to the same if called as a witness in this action.

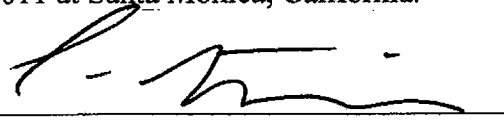
2. A true copy of the "Promotional Representation Agreement" between Plaintiff Deliverance Poker, LLC and Defendant Michael Mizrachi ("Mizrachi") is attached hereto as Exhibit A.

3. A true copy of the "Terms and Conditions for 2010 WSOP Main Event" between Mizrachi and Full Tilt Poker (*i.e.*, Tiltware) is attached hereto as Exhibit B.

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I declare under penalty of perjury under the laws of the United States of America that the above is true and correct and executed on March 9, 2011 at Santa Monica, California.

A handwritten signature in black ink, appearing to read "Jordan D. Grotzinger", written over a horizontal line.

Jordan D. Grotzinger

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Paul R. Bessette
Paul R. Bessette
State Bar No. 02263050
R. Adam Swick
State Bar No. 24051794
300 W. 6th Street, Suite 2020
Austin, TX 78701
Tel: (512) 320-7250
Fax: (512) 320-7210
(bessettep@gtlaw.com)
(swicka@gtlaw.com)
Attorneys for Tiltware, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of March, 2011, a true and correct copy of the foregoing was served upon the following counsel via the Court's CM/ECF system or First Class Mail:

/s/ R. Adam Swick

Douglas M. Becker
Gray & Becker, P.C.
900 West Avenue
Austin, TX 78701
(512) 482.0924
Attorneys for Plaintiff

William Pieratt Demond
Conner & Demond, PLLC
701 Brazos St., Suite 500
Austin, Texas 78701
(512) 917-2111
Attorneys for Plaintiff

John P. Henry
The Law Offices of John Henry, P.C.
407 West Liberty Street
Round Rock, TX 78664
(512) 428.5448
Attorneys for Defendant Michael Mizrach