

EXHIBIT A

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

DANIEL R. CASTRO,)
Plaintiff,) Cause No. 1-10-CV-000695-LY
) Hon. Lee Yeakel
v.)
)
ENTREPRENEUR MEDIA, INC.,)
Defendant.)
-----)
)
ENTREPRENEUR MEDIA, INC.,)
Counterclaimant,)
)
v.)
)
DANIEL R. CASTRO,)
Counterdefendant.)

**DECLARATION OF WILLIAM G. BARBER IN SUPPORT OF
DEFENDANT ENTREPRENEUR MEDIA, INC.'S OPPOSITION TO
PLAINTIFF'S MOTION FOR LEAVE TO AMEND COMPLAINT**

I, William G. Barber, declare as follows:

1. I am managing partner in the law firm of Pirkey Barber LLP, counsel for Entrepreneur Media, Inc. ("EMI") in the above-entitled case. As such, I have personal knowledge of the matters set forth herein and, if called upon to do so, could and would testify as follows.

2. On May 13, 2011, I spoke with Daniel R. Castro, the plaintiff in this matter, via telephone. Mr. Castro notified me that he intended to seek leave to amend his complaint in light of the Court's order dismissing several of his claims, and asked if EMI would be willing to consent to such a motion. I informed Mr. Castro that EMI would need to know how he intended to amend his complaint in order to reach a decision with regard to whether EMI would consent to such an amendment. Mr. Castro responded only that he intended to "re-urge" most of his

previous claims that had been dismissed (excluding his antitrust claim); Mr. Castro did not indicate that he intended to assert new claims.

3. Mr. Castro never sent me a copy of the proposed amended complaint, nor did he contact me again to follow up regarding the proposed amendment.

I declare under penalty of perjury under the laws of Texas that the foregoing is true and correct and that this declaration was signed on June 8, 2011, at Austin, Texas.

/s/ William G. Barber
William G. Barber