

1 Gordon regarding Omni Innovations LLC. I find no record of having consulted
2 with or having undertaken any work relative to Omni Innovations LLC. I have
3 had, in years past, minimal contact with Mr. Gordon. That prior contact is fully
4 addressed in the Exhibits and Memorandum which is identified as Exhibits to the
5 Defendants' Memorandum Opposing Plaintiff's Motion to Disqualify.

6 The Exhibits annexed to Mr. Gordon's Declaration, in this present matter,
7 were previously considered in a like Motion to Disqualify brought in a like case by
8 Mr. Gordon's wife in the Eastern District. I find no file, no memos, notes or any
9 evidence that assistance was provided to Mr. Gordon relative to Omni Innovations
10 LLC.

11 However, it is with certainty that I have not engaged in any effort regarding
12 Omni Innovations LLC and any issue in the case of Omni Innovations LLC. Any
13 contact by Mr. Gordon with this office relative to his intent to pursue violations of
14 RCW 19.190 are documented in the email annexed to Mrs. Gordon's Declaration
15 in the Eastern District matter of Gordon v. Impulse Marketing Group.

16 DATED this 20th day of October, 2006

17 LIEBLER, IVEY, CONNOR, BERRY & ST. HILAIRE

18
19 By s/ FLOYD E. IVEY

20 FLOYD E. IVEY, WSBA #6888

21 Counsel for Defendant
1141 N. Edison, Suite C
Kennewick, WA 99336

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23 I hereby certify that on October 20, 2006, I electronically filed **Declaration**
24 **of Floyd E. Ivey Opposing Motion to Disqualify** with the Clerk of the Court
using the CM/ECF System which will send notification of such filing to Plaintiffs'
counsel Robert J. Siegel and Douglas McKinley.

25 S/ FLOYD E. IVEY
26 FLOYD E. IVEY