

Honorable Ronald B. Leighton

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13 **UNITED STATES DISTRICT COURT**
14 **FOR THE WESTERN DISTRICT OF WASHINGTON**

15 CAROLYN ANDERSON,

16 Plaintiff,

17 v.

18 DOMINO'S PIZZA, INC., DOMINO'S
19 PIZZA, LLC, FOUR OUR FAMILIES,
20 INC. and CALL-EM-ALL, LLC,

21 Defendants.

CIVIL ACTION NO.: 11-cv-00902-RBL

**DECLARATION OF
SCOTT SHAFFER, ESQ. IN
SUPPORT OF MOTION
FOR SUMMARY JUDGMENT**

22 I, Scott Shaffer, am an attorney with Olshan Frome Wolosky, LLP, counsel for
23 Defendant Call-Em-All, LLC in the above captioned matter. I am over 18 years of age and
24 am otherwise qualified to make the following declaration based on personal first-hand
knowledge.

1. Attached as Exhibit 1 are true and correct copies of pertinent sections of the
deposition transcript of Plaintiff Carolyn Anderson.

Declaration of Scott Shaffer
Anderson v. Call-Em-All's - Page 1

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1 2. Attached as Exhibit 2 are true and correct copies of pertinent sections of the
2 deposition transcript of Defendant Call-Em-All, LLC's president Brad Hermann.

3 3. Attached, as Exhibit 3 is a true and correct copy of Call-Em-All's Terms of
4 Use, which was produced by Call-Em-All, LLC in the discovery phase of this action as
5 Bates-stamped documents CEA000043 - CEA000048.
6

7 4. Attached as Exhibit 4 is a true and correct copy of pertinent sections of the
8 deposition transcript of Defendant Four Our Families Inc.'s owner Michael W. Brown.

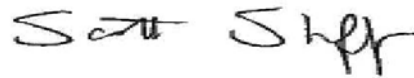
9 5. Attached as Exhibit 5 are true and correct copies of Four Our Families,
10 Inc.'s response to Call-Em-All's Request For Production No. 5 and the accompanying
11 document production by Four Our Families, Inc. of Call-Em-All's Terms of Use.
12

13 6. Attached, as Exhibit 6 is a true and correct copy of an e-mail sent on behalf
14 of Four Our Families, Inc. in this action.

15 7. Attached, as Exhibit 7 is a true and correct copy of the March 19, 2010
16 solicitation letter from Williamson & Williams to Plaintiff Carolyn Anderson.

17 I declare under penalty of perjury under the laws of the State of Washington that
18 the foregoing is true and correct.

19 Dated: June 26, 2012
20 New York, New York

21 

22 _____
23 Scott Shaffer
24

Declaration of Scott Shaffer
Anderson v. Call-Em-All's - Page 2

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