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HONORABLE RONALD B. LEIGHTON

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

CAROLYN ANDERSON,

Plaintiff,

v.

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

Defendants.

CIVIL ACTION NO.: C11-902-RBL

**DECLARATION OF SCOTT SHAFFER,
ESQ. IN SUPPORT OF DEFENDANT
CALL-EM-ALL, LLC's MOTION FOR
EXTENSION OF TIME TO FILE
EXPERT TESTIMONY UNDER FRCP 26**

Noted for Hearing: May 11, 2012

I, Scott Shaffer, declare as follows:

1. I am a member of Olshan Grundman Frome Rosenzweig & Wolosky LLP, attorneys representing Defendant Call-Em-All, LLC in this case. I am over the age of 18 and competent to provide testimony on the matters below, which constitute my first hand knowledge.

**DECLARATION OF SCOTT SHAFFER IN
SUPPORT OF DEFENDANT CALL-EM-ALL, LLC's
MOTION FOR EXTENSION OF TIME TO FILE
EXPERT TESTIMONY UNDER FRCP 26– Page 1**
Case No. 11-902-RBL

**CORR CRONIN MICHELSON
BAUMGARDNER & PREECE LLP**
1001 Fourth Avenue, Suite 3900
Seattle, Washington 98154-1051
Tel (206) 625-8600
Fax (206) 625-0900

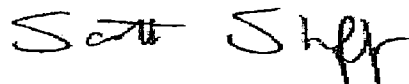
1 2. I have identified an expert whom I would like to retain to provide expert
2 testimony regarding the broadcasting industry and the categorizations of call broadcasters
3 within that industry as it relates to the legal issues of this case.

4 3. I was unable to reach my client for some time due to an unexpected
5 hospitalization of my client's father. Without being able to reach him, I was unable to
6 authorize the expert to incur expenses in performing the necessary work to provide this
7 Court and the parties with his report.

8 4. However, on Wednesday April 25, late in the evening, I was able to confer
9 with my client who authorized me to retain the expert I located. We are prepared to identify
10 him immediately and have him commence preparing his report during the week of May 1st.

11 I certify under penalty of perjury of the laws of the State of Washington and the
12 United States that the foregoing statements are true and correct.

13 Dated: April 27, 2012

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18 _____
19 **SCOTT SHAFFER**

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies as follows:

3 I am employed at Corr Cronin Michelson Baumgardner & Preece LLP, attorneys of
4 record for Defendant Call-Em-All, LLC herein.

5 I hereby certify that on this date, I electronically filed the attached foregoing with
6 the Clerk of the Court using the CM/ECF system, which will send notification of such
7 filing to the following persons:
8

9 Kim Williams
10 Rob Williamson
11 Williamson & Williams
12 17253 Agate St. NE
13 Bainbridge Island, WA 98110
14 *Attorneys for Plaintiffs*

David M. Soderland
Dunlap & Soderland, P.S.
901 Fifth Avenue, Suite 3003
Seattle, WA 98164
Attorneys for Domino's Pizza, LLC

13 Nelson C. Fraley II
14 Faubion, Reeder, Fraley & Cook, P.S.
15 5920 – 100th St. SW #25
16 Lakewood, WA 98499
17 *Attorneys for Defendant Four Our Families, Inc.*

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

20 DATED: April 27, 2012 at Seattle, Washington.

21 
22 Heidi M. Powell

23
24 **DECLARATION OF SCOTT SHAFFER IN
SUPPORT OF DEFENDANT CALL-EM-ALL, LLC's
MOTION FOR EXTENSION OF TIME TO FILE
EXPERT TESTIMONY UNDER FRCP 26– Page 3
Case No. 11-902-RBL**

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