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The Honorable Karen Strombom

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

KEN ARONSON,)	
)	
Plaintiff,)	No. 3:10-CV-05293-KLS
)	
v.)	DECLARATION OF ERIC
)	TURNBOW
DOG EAT DOG FILMS, INC.,)	
)	
Defendant.)	
)	

I, Eric Turnbow, am over the age of 18 and have personal knowledge of all the facts stated herein and declare as follows:

1. In 1997, I recorded with plaintiff Ken Aronson home video footage of a trip we took to England and Amsterdam. I provided a copy of this home video footage, transferred in its entirety from its original format to three VHS cassette tapes, to my attorney in *Aronson v. Turnbow*, Thurston County Superior Court, Cause No. 08-2-02542-7. These three VHS cassettes have been transferred in their entirety to three DVDs, a true and correct copy of which is attached hereto as Exhibit A.

DECLARATION OF ERIC TURNBOW (3:10-CV-05293-KLS) - 1
DWT 14828415v1 0092022-000001

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the ___ day of June, 2010, I caused to be filed electronically
3 the above and foregoing document with the court, using the CM/ECF system, which will
4 send email notification of such filing to the below addressees, with the physical materials
5 in the accompanying exhibits filed with the Clerk's office by hand delivery. I served a true
6 and correct copy of the following documents by the method indicated below and addressed
7 as follows:

8 **Attorneys for Plaintiff:**

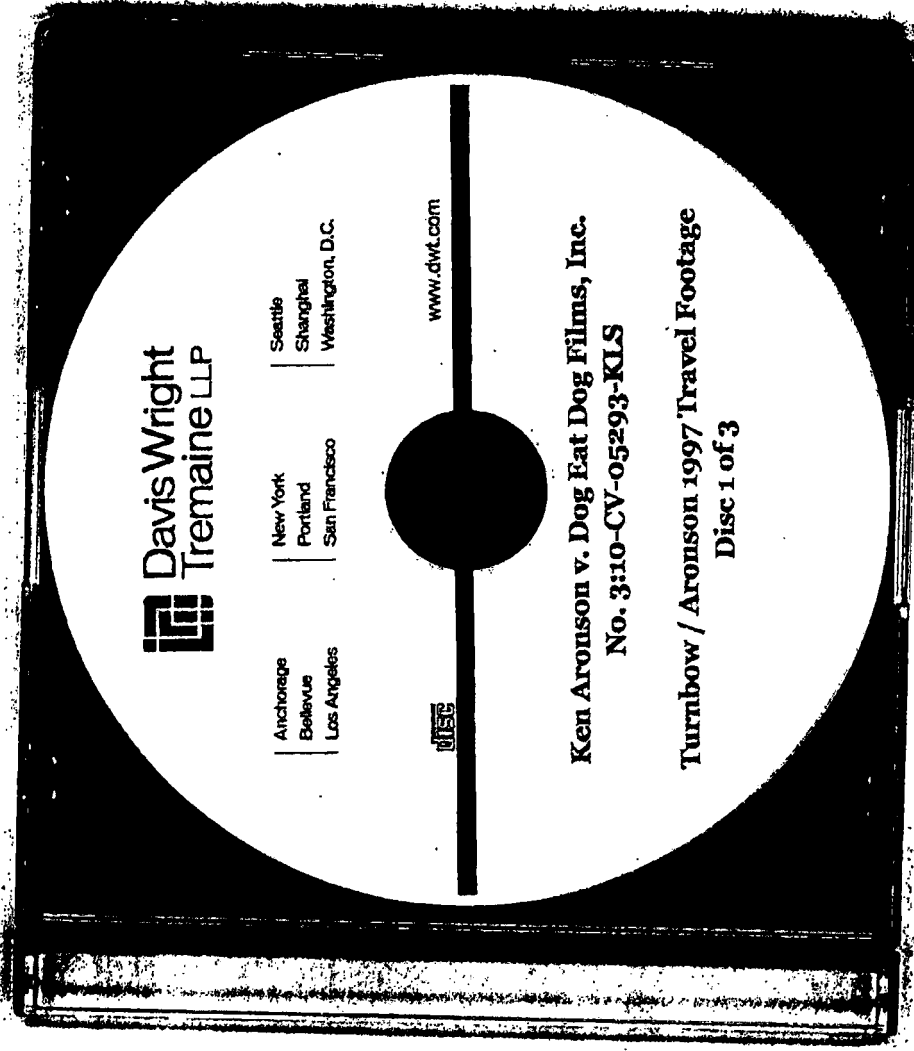
9 Thomas Brian Vertetis
10 Brian D. Doran
11 Pfau Cochran Vertetis Kosnoff PLLC
12 911 Pacific Avenue
13 Suite 200
14 Tacoma, WA 98402

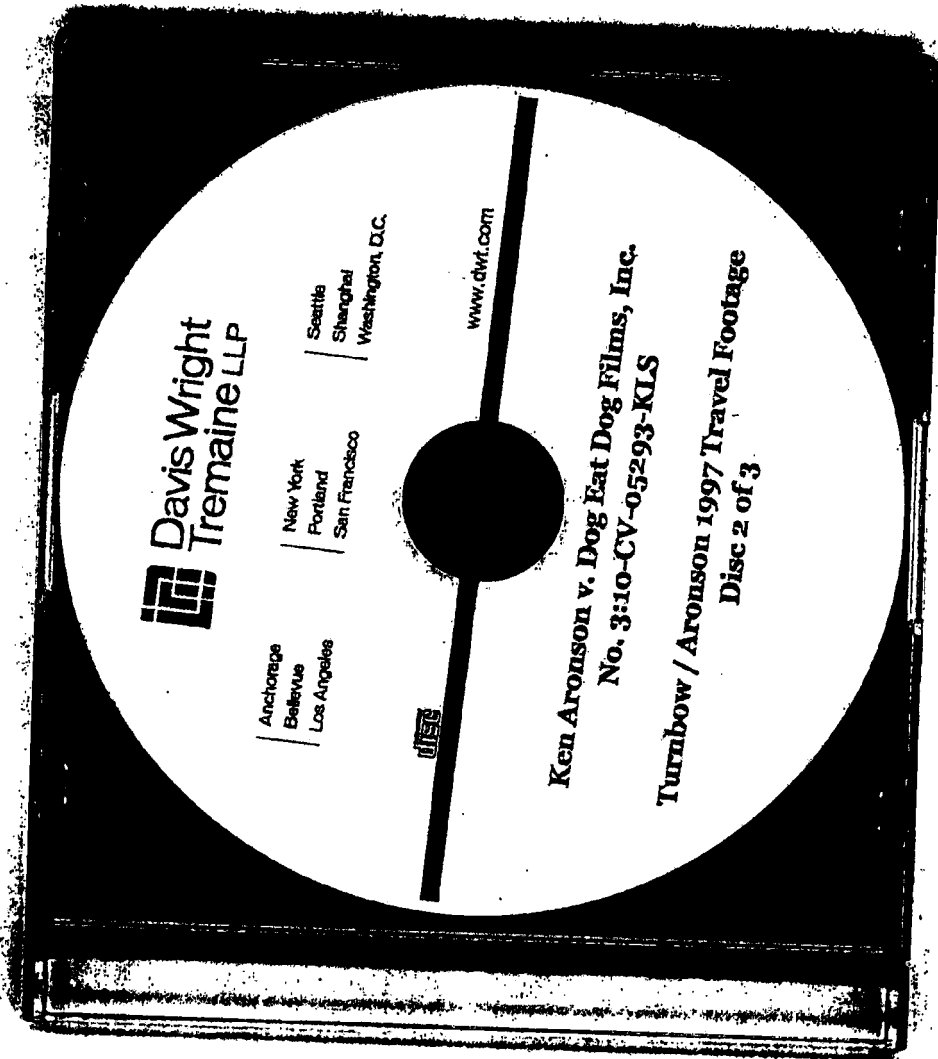
_____ U.S. Mail
_____ Hand Delivery
_____ Overnight Mail
_____ Facsimile
_____ X CM/ECF Notification via email
service to: tom@pcvklaw.com and
bryan@pcvklaw.com

15 Declared under penalty of perjury dated at Seattle, Washington this ___ day of June,
16 2010.

17 /s/ Noelle H. Kvasnosky
18 Noelle H. Kvasnosky

EXHIBIT A





 Davis Wright
Tremaine LLP

Anchorage
Bellevue
Los Angeles

New York
Portland
San Francisco

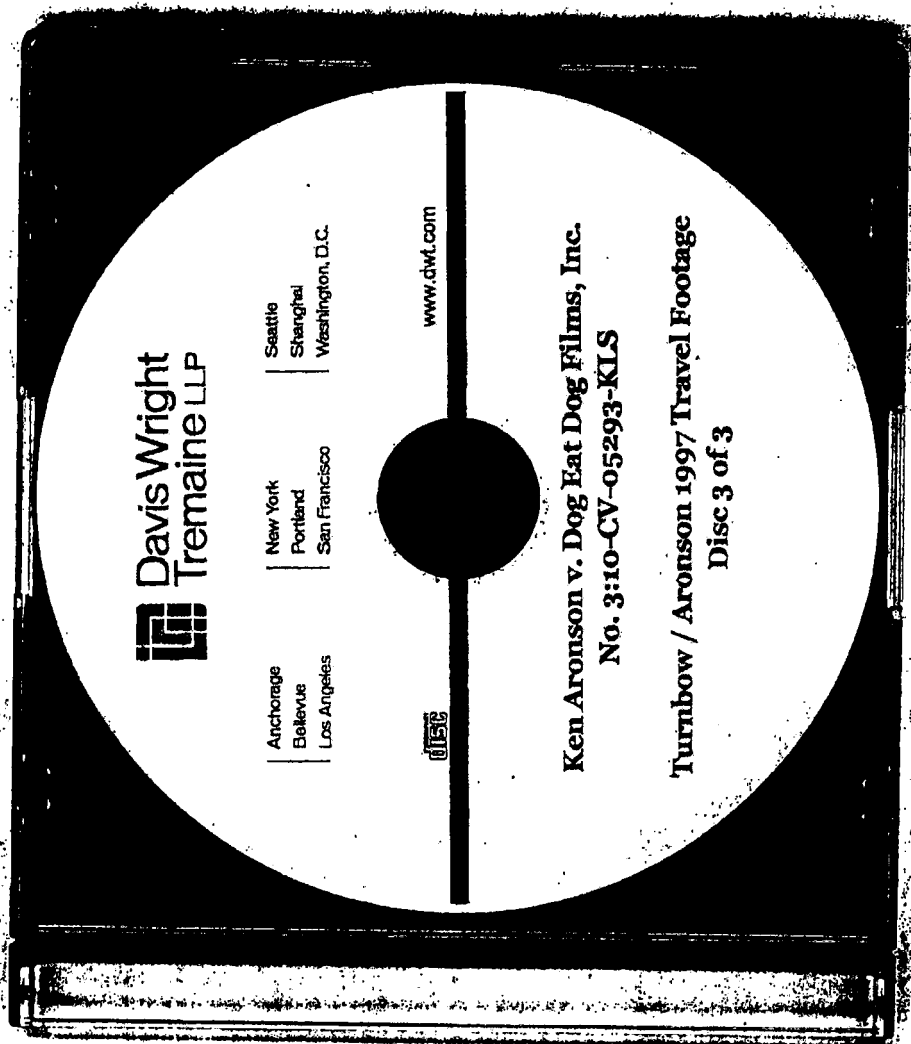
Seattle
Shanghai
Washington, D.C.

www.dwt.com

DWT

Ken Aronson v. Dog Eat Dog Films, Inc.
No. 3:10-CV-05293-KLS

Turnbow / Aronson 1997 Travel Footage
Disc 2 of 3



 **Davis Wright
Tremaine LLP**

Anchorage
Bellevue
Los Angeles

New York
Portland
San Francisco

Seattle
Shanghai
Washington, D.C.



www.dwt.com

**Ken Aronson v. Dog Eat Dog Films, Inc.
No. 3:10-CV-05293-KLS**

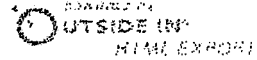
**Turnbow / Aronson 1997 Travel Footage
Disc 3 of 3**

EXHIBIT B



SO 3014
SO 3023
SO 3029

Print - Close Window



STANDARD MATERIALS RELEASE

Description of Materials:

Owner:

For good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, I grant permission to Goldflat Productions, LLC and its successors, assigns and licensees, permission to use the above described materials, in whole or in part, and the footage containing the above described materials in and in connection with a motion picture about healthcare (the "Picture") and in all exhibition, distribution, exploitation, marketing, promotion, soundtrack albums for and advertising thereof, and in connection with any rights associated therewith, in any and all media of any nature whatsoever, whether now known or hereafter devised, throughout the universe in perpetuity (the "Rights").

I expressly release to Goldflat Productions LLC, and its parent, subsidiaries and affiliates, and the employees, officers, directors and agents of each of them, and its successors, assigns and licensees, from any claims, damages, liabilities or expenses I may have arising out of the production, broadcast, exhibition, distribution, exploitation, marketing, promotion, and other uses of the Picture and elements thereof and the footage containing the above described materials.

Your signature indicates that you have the right to enter into this agreement and to grant the rights as stated above.

Signature: Eric Turnbow Date: 10/23/06

Name (print): ERIC TURNBOW

Address: 1713NE TULLIS OLYMPIA WA 98506

Phone #: 360 943-7039

EXHIBIT C

mike@michaelmoore.com

From: Eric Turnbow (E.T.) [etcosmic2000@yahoo.com]
Sent: Friday, October 27, 2006 6:05 PM
To: Christine Fall
Subject: Permission to use materials

Attachments: I'maliveart.jpg

I'maliveart.jpg (5
KB)

Okay....

I am giving goldflat productions permission to use materials I have sent them in their upcoming movie.

These items will be attached to the waiver that I signed on 10/23/06! These include:

a original cd "I'm Alive" which Eric Turnbow owns the copywrite to. You can use the artwork as well such as the cover of the cd where I am sitting on the steps of "Abby Road" studios. Use whatever you need with my blessing.

Two video tapes. 4 hours in length of travels in London England in the year 1997. Home videos shot vacationing.

2 photos taken with a camera.

If you need another waiver signed I can do that.
otherwise just print this email and attach it with my blessing.

Sorry I did not fill it out all the way. Lots to do. I am very busy. We had 35 singers at my bar last night! And it is only Thursday. We are rocking and rolling baby!

Eric Turnbow

--- Christine Fall <christine@michaelmoore.com> wrote:

> Eric,
>
> I wanted to let you know that I received the tapes and pictures and
> CD. I received the material release. I got it but you didn't fill
> out the top portion where it says "Description of materials".
> Can you please list here
> exactly what you sent that you are giving us permission to use. List
> description, format, length for video and include description of CD
> and pictures as well.